

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Request for Review of the)	
)	CC Docket No. 02-6
Decision of the)	
Universal Service Administrative Company)	File No. _____
)	
By)	
)	
Electronic Classroom of Tomorrow ("ECOT"))	
Billed Entity #221005)	
471 Application # 1009681)	
FRNs # 2791199, # 2840474)	

To: Office of the Secretary, FCC
Attention: Chief, Wireline Competition Bureau

REQUEST FOR REVIEW

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SUMMARY

Electronic Classroom of Tomorrow (“ECOT”) seeks review of a July 27, 2016 Administrator’s Decision on Appeal for Funding Year 2015-2016 of the Schools and Libraries Division of the Universal Service Administrative Company for a denial of funding for wired and wireless Internet access services used to support ECOT’s virtual classroom and state-mandated testing sites.

ECOT challenges the bases upon which USAC denied funding for the Internet access services largely stemming from USAC’s failure to recognize how a virtual classroom operates. With regard to its funding request for wired services, ECOT contests USAC’s assertion that a data center provided by its Internet access service provider should have been identified and evaluated as an ECOT entity. Moreover, ECOT challenges USAC’s finding that its funding request for 3Gbps/3Gbps Internet access to support a virtual classroom for 16,000 students was not cost effective.

In addition to denying funding for wired Internet access services to support ECOT’s virtual classroom, USAC also denied funding for individual data plans and air cards used to provide Internet access at ECOT’s temporary testing centers. ECOT asserts that its use of wireless data plans was appropriate because it is the most cost-effective option for the temporary testing centers located throughout the state of Ohio, and it would be physically impossible to install hard wired solutions in the temporary, third party owned sites.

ECOT requests that the Commission review its appeal and overturn USAC’s decision to deny ECOT of the funding necessary to support its virtual classroom and state-mandated testing centers.

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To: Office of the Secretary, FCC
Attention: Chief, Wireline Competition Bureau

REQUEST FOR REVIEW

Pursuant to Section 54.719(b) of the Rules of the Federal Communication Commission ("FCC" or "Commission"), Electronic Classroom of Tomorrow ("ECOT"), respectfully requests review of the July 27, 2016 Administrator's Decision on Appeal – Funding Year 2015-2016¹ ("Decision on Appeal") of the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC"). In the Decision on Appeal, USAC denied funding for ECOT's FCC Form 470 #146500001272220² and associated Form 471 #1009681³ and Funding Request Numbers ("FRN") 2791199 and 2840474 for Funding Year 2015 (07/01/2015 – 06/30/2016). In total, USAC denied \$622,615.97 in requested discounted funds for wired and

¹ Administrator's Decision on Appeal – Funding Year 2015-2016, July 27, 2016 ("Decision on Appeal"), attached as Exhibit A.

² FCC Form 470 #146500001272220 attached hereto as Exhibit B.

³ Form 471 #1009681 attached hereto as Exhibit C ("2015 Form 471").

wireless Internet access. USAC's denial was contrary to the Commission's rules and regulations and will result in the disenfranchisement of virtual K-12 schools which are eligible entities under Ohio law and the Commission's rules.

As will be shown below, the rationale USAC provided as the bases for its denial mischaracterized the facilities and virtual classroom provided by ECOT, effectively disqualifying ECOT's virtual school from receiving funding for Internet access services to provide their students with state-required curriculum and testing necessary to complete their K-12 education.

Background

ECOT is a virtual on-line K-12 school established as a "community school" under Ohio law that provides distance learning opportunities for students across the state, including high-risk and medically challenged students. Currently, ECOT educates over 16,000 K-12 students in the state of Ohio.⁴ Since 2000, ECOT has provided students in Ohio with tuition-free, fully accredited online public school education.

ECOT is a K-12 school and is an eligible entity pursuant to the Commission's rules.⁵ In Ohio, community schools such as ECOT are established pursuant to Section 3314 of the Ohio Revised Code, which provides in pertinent part:

"A community school created under this chapter is a public school, independent of any school district, and is part of the state's program of education. A community school may sue and be sued, acquire facilities as needed, contract for any services necessary for the operation of the school, and enter into contracts with a sponsor pursuant to this chapter. The governing authority of a community school may carry out any act and ensure the performance of any function that is in compliance with the Ohio Constitution, this chapter, other statutes applicable to community schools, and the contract entered into under this chapter establishing the school."⁶

⁴ See Map of Students Across Ohio, attached as Exhibit D.

⁵ See 47 C.F.R. §54.500 ("An 'elementary school' means an elementary school as defined in 20 U.S.C. 7801(18), a non-profit institutional day or residential school, including a public elementary charter school, that provides elementary education, as determined under state law.")

⁶ O.R.C. § 3314.01.

Under Ohio law, “community schools” are considered school districts for purposes of state and federal funding:

A community school shall be considered a school district and its governing authority shall be considered a board of education for the purpose of applying to any state or federal agency for grants that a school district may receive under federal or state law or any appropriations act of the general assembly. The governing authority of a community school may apply to any private entity for additional funds.⁷

ECOT is chartered as a specific type of community school identified as an “Internet- or computer-based community school,” which Ohio Code defines as:

[A] community school established under this chapter in which the enrolled students work primarily from their residences on assignments in nonclassroom-based learning opportunities provided via an internet- or other computer-based instructional method that does not rely on regular classroom instruction or via comprehensive instructional methods that include internet-based, other computer-based, and noncomputer-based learning opportunities [...]⁸

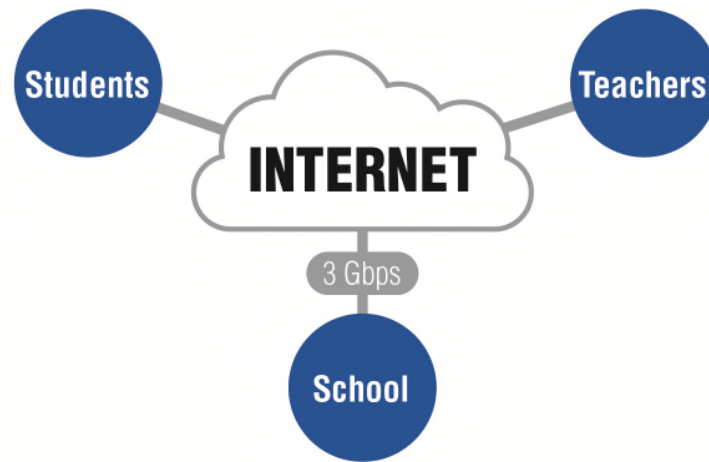
As in brick and mortar public schools, ECOT students are expected to complete schoolwork for 25 hours per week during the school year. ECOT’s curriculum is approved by the State of Ohio, and its students are required to take state tests throughout the school year and pass the Ohio Graduation Test to receive a high school diploma. However, ECOT is able to provide its students flexibility by offering online attendance at a time that works for their schedule. The school offers a unique educational experience to students that may not otherwise be able to attend a traditional public school, including students facing medical issues.

ECOT students perform schoolwork on their own computers or using computers supplied by ECOT at no cost to the student. As a virtual school, students and teachers meet in a virtual classroom located at the portal provided by ECOT where students access their curricula and

⁷ O.R.C. § 3314.082.

⁸ O.R.C. § 3314.02(A)(7).

interact with their teachers. The students and teachers reach the portal using non-E-rated connections:



In addition to teaching lessons online, ECOT provides testing centers for students to complete state-required achievement and diagnostic assessments. Most of the testing sites are temporary and all the testing sites are scattered across the state based on where the students are located. Ohio law requires Internet- and computer-based community schools, like ECOT, to provide students with testing sites located within a fifty-mile radius of a student's residence.⁹

Discussion

The Decision on Appeal denied ECOT's funding requests for two services: (1) Internet access service to support ECOT's virtual classroom; and (2) funding for individual data plans and air cards to provide an Internet connection at ECOT's temporary testing facilities. USAC provided a variety of bases for denial of the appeal, all of which largely stemmed from USAC's failure to recognize how a virtual classroom operates.

Internet Access for the Virtual Classroom

⁹ O.R.C. § 3314.25; See ECOT Map of Testing Centers, attached as Exhibit E.

Since FY 2012, ECOT has received the Internet access necessary to stand-up its virtual classrooms using the facilities of the data center operated by ECOT's service provider Easton Telecom to co-locate the ECOT servers. For every year, except for funding year 2015, E-Rate has funded the Internet access provided by Easton Telecom to stand-up ECOT's virtual classrooms. In providing the necessary level of Internet access service to support the virtual classroom, ECOT's service provider, Easton Telecom, utilizes a data center located in Worthington, Ohio.

For the first time during the 2015 funding year, ECOT was questioned by USAC about the data center location for Easton Telecom.¹⁰ ECOT's consultant, Greg Spencer, was told by the USAC helpdesk that ECOT should obtain a billed entity number for the facility.¹¹ Mr. Spencer disagreed, explaining that the data center, which was operated by ECOT's service provider, was simply a colocation facility used to stand-up ECOT's virtual classrooms.¹² Accordingly, ECOT filed in the same manner that it had in years past and did not create a new billed entity number for the data center.¹³

On September 11, 2015, Mr. Spencer received a FY 2015 E-rate Application Information Request stating that the Cost Effectiveness Review team was reviewing ECOT's funding request for cost effectiveness, because the requested funding appeared to be more expensive than expected given the description of services and number of students served.¹⁴ In response to the request, Mr. Spencer provided various documents describing the services provided by Easton Telecom.

¹⁰ See Declaration of Greg Spencer at 2, September 26, 2016, attached as Exhibit F ("Spencer Declaration").

¹¹ See Spencer Declaration at 3.

¹² *Id.* at 4.

¹³ *Id.* at 5; see also Exhibit C, 2015 Form 471.

¹⁴ See FY 2015 E-Rate Application Information Request, September 11, 2015, attached hereto as Exhibit G.

On December 9, 2015, Mr. Spencer received another information request from USAC asking again, in part, about the data center and stating that USAC had determined that ECOT's request included services to an entity that was not listed on the Form 471 application.¹⁵ Mr. Brad C. Scott, Director of IT at ECOT, explained that ECOT was the eligible entity that was listed on the Form 471 and that the data center was merely where the service provider co-located its equipment which allowed ECOT to stand up its virtual classroom.¹⁶

On February 18, 2016, Mr. Spencer received a further information request from USAC stating that its funding request for Internet access services would be denied because the request was for service to an ineligible entity, referring to the data center.¹⁷ The letter further stated that the funding would be denied because services were being provided for a "cyber-school entity utilized by students while located off-premise" and because the funding request was not cost effective for a school that had no students located on site.¹⁸ On February 25, 2016, Mr. Spencer again explained the nature of the data center and that it was being used to support ECOT's curriculum.¹⁹

On March 24, 2016, ECOT received the Funding Commitment Decision Letter ("FCDL") denying ECOT funding for \$722,124.00 worth of undiscounted Internet access services provided by Easton Telecom to stand up ECOT's virtual classroom.²⁰ According to the FCDL, USAC determined that the facility, from which Internet access services were being provided by ECOT's

¹⁵ FY 2015 E-Rate Application Information Request, December 9, 2015, attached hereto as Exhibit I.

¹⁶ See ECOT Response to FY 2015 E-Rate Application Information Request, January 6, 2016, attached hereto as Exhibit J.

¹⁷ See FY 2015 E-Rate Application Information Request, February 18, 2016, attached hereto as Exhibit K.

¹⁸ *Id.*

¹⁹ See ECOT Response to FY 2015 E-Rate Application Information Request, February 25, 2016, attached hereto as Exhibit L.

²⁰ See Funding Commitment Decision Letter, Funding Year 2015: 07/1/2015-6/30/2016), March 24, 2016, attached hereto as Exhibit M ("FCDL").

service provider Easton Telecom, was an ECOT facility.²¹ Based on this assertion, USAC concluded that ECOT was seeking E-rate funding for services located at a non-eligible facility, i.e., a facility that does not meet the requirements of Section 54.501 of the Commission’s rules which defines eligible recipients as “schools meeting the statutory definition of ‘elementary school’ or ‘secondary school.’”²² As an extension of this conclusion, USAC found that the funding request was not cost effective, because no students were located on the site of the data center and more than 30% of the funding was being used by students located off-site.²³

On May 23, 2016, ECOT filed an appeal of the FCDL and requested that USAC support funding for the Internet Access service provided by its service provider, Easton Telecom, at Easton Telecom’s data center where ECOT’s servers that were used to stand-up the virtual classroom were co-located.²⁴ USAC denied the appeal on July 27, 2016 again citing to the fact that: (1) the data center was not an eligible entity; (2) the request was for services utilized by students while located off-premise and; and (3) the service was not cost-effective for a school without any students located on site.²⁵

Despite USAC’s assertion, ECOT has never agreed that the Easton Telecom data center was an ECOT facility. It is not. As previously explained to USAC, ECOT does not dispute the fact that the data center is neither a school, administrative office nor a non-instructional facility associated with a school. Rather, ECOT is the applicant and the billed entity and ECOT is a K-12 school under Ohio law and the FCC’s rules. The “off premise site” referred to by USAC is not off premises. It is on premises because it is the physical location of the meet up between ECOT’s

²¹ *Id.*

²² 47 C.F.R. 54.501; *see also* FCDL at Exhibit M.

²³ *See* FCDL at Exhibit M.

²⁴ *In the Matter of Request for Appeal of Decision of the Universal Service Administrative Company by Applicant/Appellant: Electronic Classroom of Tomorrow*, May 23, 2016, attached hereto as Exhibit N.

²⁵ Administrator’s Decision on Appeal – Funding Year 2015-2016 at Exhibit A.

servers which create the virtual classroom and the data circuits necessary to stand-up the virtual classroom.

USAC's determination mischaracterizes the operations of a virtual school. The Internet access services requested by ECOT are (i) utilized to stand-up ECOT's virtual classroom, which is the "location" where ECOT students meet with their teachers; (ii) where the students are accessing state-approved curriculum; (iii) and where the students fulfill the state requirements necessary for graduation. The virtual classroom created at the data center is where 16,000 ECOT students meet with ECOT faculty teachers and where they attend their classes. The students are not located off-premises as found by USAC, but rather the Internet Access that stands up the virtual classroom is the school and that is where the students meet with their teacher to attend classes.²⁶

As a virtual school, ECOT must provide a virtual classroom for its students to meet with their teachers. ECOT provides the virtual classroom environment using Internet access provided by its service provider through a data center. ECOT, as the provider of the virtual classroom, is the appropriate billed entity for Internet access to support the virtual classroom. Section 54.500 of the Commission's rules defines a "billed entity" as an "entity that remits payment to service providers for services rendered to eligible schools and libraries."²⁷ ECOT, not the data center, is the entity that remits payment to Easton Telecom for Internet access services provided utilizing the data center. ECOT, not the data center, is the eligible entity – a school meeting the statutory definition of "elementary school"²⁸ –that seeks discounts for the Easton Telecom-provided Internet access service.

²⁶ Both students and teachers reach the virtual classroom on their own through facilities not covered by E-rate and meet in the virtual classroom, which is eligible for funding under the E-rate rules.

²⁷ 47 U.S.C. §54.500.

²⁸ 47 U.S.C. 54.501(a)(1).

USAC's finding that \$722,124.00 for 3Gbps/3Gbps Internet access services to support a virtual classroom for 16,000 students was not cost effective is equally flawed. Section 54.511(a) of the Commission's rules requires that entities select the most cost-effective service offering.²⁹ USAC's conclusion that a virtual school should not need significant bandwidth simply because no students are physically present on its campus ignores the reality that a virtual school typically has greater bandwidth needs than a traditional school. Nothing could be farther from the truth. The 3Gbps/3Gbps connection requested by ECOT is necessary to provide students with 24/7 continuous access to ECOT's virtual classroom environment.³⁰

In a 24-hour period, ECOT transfers approximately 5-6 TB of total data in order to deliver its virtual classroom materials to students located across the state of Ohio.³¹ Increasingly, much of the content accessed by students has been HD video classroom content which utilizes between five (5) to eight (8) Mbps.³² If only 600 of ECOTs over 16,000 currently enrolled students needed simultaneous access to that HD content, ECOT would exceed the 3Gbps connection it purchased.³³ In order to provide the quality of services required of an online community school in the state of Ohio, ECOT needs to purchase sufficient bandwidth to serve its 16,000 students and must meet the increased bandwidth needs of advancing technology for its virtual classroom. \$722,124.00 represents a reasonable amount for a 3Gbps/3Gbps Internet access service that must sustain continuous traffic from students accessing the virtual classroom from across the state.

By way of example, for Funding Year 2015, a brick and mortar school district in central Ohio ("Central Ohio School District") obtained 1GB of bandwidth per school building to supply

²⁹ 47 CFR 54.511(a).

³⁰ See Spencer Declaration at 6.

³¹ See Spencer Declaration at 7.

³² See Spencer Declaration at 8.

³³ See Spencer Declaration at 9.

Internet access for its 14,000 student population at 19 different building locations.³⁴ The annual cost of 1GB bandwidth for each building was \$34,800.³⁵ Broken down by student, the Central Ohio School District paid \$52.11 per student for bandwidth. The 14,000 students received a 1.36mb share per student of bandwidth.

In comparison, ECOT supplies 3 Gbps of bandwidth to support the 16,000 students that attend its virtual classroom. On a per student basis, ECOT pays \$45.13 for bandwidth for each student. The 16,000 students receive a 0.19mb share per student of bandwidth. As such, the students in the Central Ohio School District receive 7.158 times the bandwidth as ECOT students at a cost of \$6.98 more per student. Based on this comparison, the 3Gbps/3Gbps Internet access purchased by ECOT for its 16,000 students is a fair and reasonable amount of bandwidth at a fair and reasonable cost.

For years, E-rate funding properly supported ECOT's virtual classroom environment. There was no change to the manner in which ECOT sought funding in 2015. In each prior year it was appropriate to fund ECOT because it is an eligible entity purchasing eligible services. Nothing has changed. Moreover as shown above, ECOT's cost for Internet access compares very favorably to a typical brick and mortar school in the same area.

Individual Data Plans and Air Cards

In addition to denying funding for Internet Access, the FCDL also denied ECOT's funding request for \$56,145.96 worth of funding for individual data cards and wireless plans used at ECOT's temporary testing centers.³⁶ The cost effectiveness of the wireless data plans was initially raised in an August 20, 2015 FY E-rate Application Information Request.³⁷ There,

³⁴ See Spencer Declaration at 10.

³⁵ *Id.*

³⁶ See FCDL at Exhibit M.

³⁷ See 2015 FY E-rate Application Information Request, August 20, 2015, attached as Exhibit O.

USAC asked various questions about the wireless data plans and stated that they were only eligible for support if they were the most cost effective option or installing a wireless local area network was not physically possible due to geographical or other limitations.³⁸ In its response to the information request, ECOT explained that virtual schools in Ohio were required to establish testing centers within 50 miles of the location of any of its students in order to provide the student with teacher-monitored, state-required testing.³⁹ ECOT further explained that the locations are temporary in nature and that ECOT does not have authority to install any type of wired Internet access in the facilities.⁴⁰

On January 8, 2016, USAC sent another 2015 E-rate Application Information Request stating that it had determined that the wireless data plans were ineligible for funding, because they were used off-premise and because ECOT had not demonstrated that either installing a wireless local area network was not physically possible or that the wireless data plans were the most cost-effective option.⁴¹ Again, ECOT explained in its response that the wireless data plans were being used for state-required testing facilities where students had to be present to take teacher-monitored tests and that the wireless data plans were the only available solution for the testing centers and were the most cost effective option due to the temporary nature of the facilities.⁴²

On March 24, 2016, USAC sent an FCDL denying funding for the wireless data plans.⁴³ According to the FCDL the funding was denied, because more than thirty percent of the funding request was for off-premise usage and ECOT had not shown that either installing a wireless

³⁸ *Id.*

³⁹ See ECOT Response to FY 2015 E-Rate Application Information Request, January 6, 2016, attached hereto as Exhibit P.

⁴⁰ *Id.*

⁴¹ See 2015 FY E-rate Application Information Request, January 8, 2016, attached hereto as Exhibit Q.

⁴² See 2015 FY E-rate Application Information Request, January 19, 2016, attached as Exhibit R.

⁴³ See FCDL at Exhibit M.

network area was physically impossible or the individual data plans were the most cost-effective option.⁴⁴

On May 23, 2016, ECOT appealed the FCDL with USAC and requested funding for the wireless data plans. On July 27, 2016, USAC denied the appeal finding that ECOT had not sufficiently demonstrated that it was either physically impossible for install a wireless local area network or that the individual data plans were the most cost-effective option.⁴⁵

ECOT's use of wireless data plans was appropriate because it is the most cost-effective option for the temporary testing centers located throughout the state of Ohio, and it would be physical impossibility to install hard wired solutions in these temporary, third party owned sites.

The Commission established a new requirement for the use of data plans and air cards for mobile devices in 2014. In the *First E-rate Modernization Order*, the Commission found that data plans and air cards for mobile devices would continue to be eligible for E-rate support, but that a school or library seeking support for the service must show that individual data plans are the most cost-effective option for providing broadband access.⁴⁶ In the *Second E-rate Modernization Report and Order* which discusses facilities like ECOT's temporary testing centers, the Commission clarified that applicants seeking funding for data plans or air cards for mobile devices should compare the cost of all components necessary to delivery connectivity to the end user, including the cost to connect traditional Internet access to a school.⁴⁷ Moreover, in the Order the Commission stated that "the impracticality or unusually high cost of purchasing a fixed broadband connection to the location should be a factor in the applicant's cost-

⁴⁴ *Id.*

⁴⁵ We note that when USAC denied ECOT's appeal, USAC did not reference the off-campus issue as an additional basis for denial of the funding. Accordingly, ECOT does not address the off-campus issue in the current appeal.

⁴⁶ *E-rate Modernization Order*, 29 FCC Rcd 8933 at ¶151 (2014).

⁴⁷ *In the Matter of Modernizing the E-rate Program for Schools and Libraries, Connect America Fund, Second Report and Order and Order on Reconsideration*, 29 FCC Rcd 15538, 15601 at ¶158 (2014) ("*Second E-Rate Modernization Order*").

effectiveness analysis” and cited to examples of bookmobiles or very small school facilities as places where individual data plans may be more cost effective.⁴⁸ Accordingly, to establish cost effectiveness for data plans and air cards, applicants must either: (1) show that it would be physically impossible to install a WLAN solution; or (2) provide a comparison of the costs to implement individual data plans as opposed to a WLAN.⁴⁹

The use of Individual data cards at ECOT’s temporary, pop-up testing facilities, is fully consistent with the FCC’s rules as detailed in the *First E-rate Modernization Order* and the *Second E-rate Modernization Report and Order*, because it is both the most cost-effective option for providing Internet access, and because it would be physically impossible to install a WLAN solution in temporary, leased facilities across the state.

ECOT utilizes over 480 pop-up sites, often located in empty storefronts in strip malls, as temporary testing facilities in order to fulfill its mandate under Ohio law to offer testing facilities within 50 miles of its 16,000+ students. In a given year, ECOT typically will use around 180 sites. Attached is a map showing the current locations of presently used testing centers.⁵⁰ Since these sites are only utilized for testing purposes, when needed, sites may be utilized for as few as three days in a given year. In other instances some sites could be used as many as seventy days a year, but not contiguously. In addition, ECOT cannot predict the location of the sites that will be

⁴⁸ *Id.*

⁴⁹ See *Requests for Waiver and Decisions of the Universal Service Administrator by Batesville Community School Corporation, et al. Batesville, Indiana Schools and Libraries Universal Service Support Mechanism*, DA 16-823 (July 21, 2016) (denying a request from Batesville Community School Corporation for a waiver of the Commission’s cost effectiveness requirements for data plans and air cards based on the assertion that the data plans and air cards were necessary for public safety concerns and therefore Batesville did not have to pass the cost-effectiveness test). Unlike Batesville, ECOT does not seek to avoid the cost-effectiveness requirement. Rather, ECOT asserts that it has met the Commission’s test for cost effectiveness because: (1) in most circumstances it is physically impossible to wire the temporary leased spaces, because the spaces are leased for a short duration of time from the space owner; and (2) even if ECOT were permitted to wire the temporary spaces, the cost of the individual data plans and air cards is substantially less than the cost of wiring a facility needed for only three days of the year.

⁵⁰ See ECOT Map of Testing Centers, attached hereto as Exhibit E.

needed over a given year as ECOT must obtain new testing sites to account for students that have moved or new students to the school.

Obtaining a wired Internet access solution at a temporary, leased, pop-up site utilized for a few days out of the year is not physically possible. The owners of these sites provide the space to ECOT on a temporary basis and would not permit ECOT to wire their facility for such a short amount of time. Nor could ECOT obtain a wired Internet access plan for less than a 30-day period of time, which would be necessary for a site leased for only a few days.⁵¹

Assuming the owners of the sites would even be willing to allow ECOT to run fiber connections and bring wired Internet access to each facility, a conservative estimate of costs would well exceed the cost of wireless data plans. By way of example, ECOT currently has a 50MB dedicated Internet access service agreement with Time Warner Cable for a 24-month term for ECOT's Dayton site at a cost of \$1,610/month; \$19,320.00/year.⁵² On average ECOT operates 180 temporary testing sites annually. If ECOT were to multiply the cost of the single site by 180 sites, the total annual cost for wired services to the testing sites would be \$3,477,600. Significantly, this number does not even account for the higher cost of fixed broadband service for a 1-month, 6-month or even 12-month term. Instead ECOT uses air cards only for the periods necessary for the testing for a total cost in 2015 of only \$56,145.96. Based on this number, even if ECOT had the ability to secure wired Internet access in some of its testing centers, the cost of the wired Internet access would be significantly higher than the cost of the wireless data plans.

⁵¹ See Spencer Declaration at 11.

⁵² See Spencer Declaration at 12.

Accordingly, because the wireless data plans are the only Internet access service physically possible in most of its sites and because they are the most cost effective method for obtaining Internet access, the funding request should have been funded.

Conclusion

As a virtual school, the needs of ECOT and ECOT's students and the facilities used to meet those needs do not fit within the structure of typical brick and mortar school. However, as an entity eligible for E-rate funding, ECOT should not be denied funding simply because it provides a K-12 education virtually. ECOT requests that the Commission review ECOT's appeal and overturn USAC's decision to deny ECOT of the funding necessary to support its virtual classroom and the testing centers required under state law.

Respectfully submitted,

ELECTRONIC CLASSROOM OF TOMORROW



By: _____

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Its Attorneys

September 26, 2016

Exhibit A

Mark Palchick
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1200 Nineteenth Street, Ste 500
Washington, DC 20036

Billed Entity Number: 221005
Form 471 Application Number: 1009681
Form 486 Application Number:



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2015-2016

July 27, 2016

Mark Palchick
Womble, Carlyle, Sandridge & Rice, LLP
1200 Nineteenth Street, Ste 500
Washington, DC 20036

Re: Applicant Name: ELECTRONIC CLASSROOM OF
TOMORROW (ECOT)
Billed Entity Number: 221005
Form 471 Application Number: 1009681
Funding Request Number(s): 2791199, 2840474
Your Correspondence Received: May 23, 2016

After review of the information and documentation provided, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's funding commitment decision for the FCC Form 471 Application Number and funding requests number(s) (FRN(s)) referenced above. This letter provides an explanation for USAC's decision. The date of this letter also begins the sixty (60) day time period for appealing this decision. If your Letter of Appeal included more than one FCC Form 471 Application Number, please note that you will receive a separate decision for each funding application.

Funding Request Number(s): 2791199, 2840474
Decision on Appeal: **Denied**
Explanation:

- The documentation provided did not sufficiently demonstrate the eligibility for discounts for the following entity according to Program rules: ECOT entity located at 535 Scherers Court, Worthington, OH 43085. Thirty percent or more amount requested in FRNs 2840474 and 2791199 include requests for services at a cyber-school entity utilized by students while located off-premise, which is an ineligible use based on Program rules. Further, FRN 2840474 is denied as a result of a Cost Effectiveness Review, which has determined that your request for Internet Access has not been justified as being cost effective as required by FCC Rules. This request is for Internet Access at a cost of \$722,124.00 which, for a school that does not have any students located on site, is excessive and not cost effective. Per the FCC Order 14-99, individual data plans and air cards are

ineligible unless applicants can demonstrate either that installing a wireless local area network is not physically possible or that individual data plans are the most cost-effective option. You have not demonstrated that either of the two exceptions applies to services requested in FRN 2791199. Therefore, FRN 2791199 is denied since services requested are ineligible. You have not provided any documentation on appeal to demonstrate that USAC erred in its initial decision. Consequently, your appeal is denied.

- FCC rules state that, in selecting a service provider, the applicant must carefully consider all bids submitted and must select the most cost-effective service or equipment offering, with price being the primary factor, which will result in being the most cost-effective means of meeting educational needs and the technology plan goals. *See* 47 C.F.R. secs. 54.511(a), 54.503(c)(2)(ii)(B), 54.504(a)(1)(ix). *See also* Request for Review of the Decision of the Universal Service Administrator by Ysleta Independent School District, El Paso, Texas, et al., Federal-State Joint Board of Universal Service, Changes to the Board of Directors of the National Exchange Carrier Association, Inc., SLD Nos. 321479, et al., CC Docket Nos. 96-45 and 97-21, Order, 18 FCC Rcd 26407, FCC 03-313 paras. 47-55 (Dec. 8, 2003). Service providers shall not charge the entities a price above the lowest corresponding price. *See* 47 C.F.R. sec. 54.511(b). In order to ensure that applicants are not requesting discounts for services beyond their reasonable needs, USAC denies funding request(s) for not being cost-effective. The costs of the products and services in a funding request should not be significantly higher than the costs generally available in the applicant's marketplace for the same or similar products or services. For example, equipment at prices two or three times greater than the prices available from commercial vendors would not be cost effective, unless there were extenuating circumstances. *See* Ysleta Order para. 54.
- FCC rules provide that funding may be approved only for eligible products and services. *See* 47 C.F.R. secs. 54.502. The USAC website contains a list of eligible products and services. *See* Eligible Services List posted in the Reference Area of the SLD section of the USAC website. FCC rules further require that if 30% or more of the applicant's funding request includes ineligible products and/or services, then the funding request must be denied, otherwise the funding request will be reduced accordingly. *See* 47 C.F.R. sec. 54.504(b). The FCC's Aiken County Public Schools Order directed USAC to permit the applicant 15-calendar days from the date of receipt of notice in writing by USAC to revise its funding request to remove the ineligible services or allow the applicant to provide additional documentation to show why the services are eligible. *See* Requests for Review of the Decisions of the Universal Service Administrator by Aiken County Public Schools, Aiken, South Carolina, et al., Schools and Libraries Universal Service Support Mechanism, File Nos. SLD-397612, et al., CC Docket No. 02-6, Order, 22 FCC Rcd 8735, FCC 07-61 para. 11 (May 8, 2007). Data plans and air cards for mobile devices are eligible for E-rate support only in instances when the school or library seeking support demonstrates that individual data plans are the most cost-effective option for providing internal broadband access for portable mobile devices at schools and libraries. In order to ensure that individual data plans are the most cost-effective option, applicants that seek funding for

individual data plans must be able to demonstrate either that installing a WLAN is not physically possible, or must provide a comparison of the costs to implement an individual data plan solution versus a wireless local area network solution. The cost comparison may be established through the competitive bidding process by seeking and comparing bids on both internal wireless networks and individual data plans. *See* In the Matter of Modernizing the E-rate Program for Schools and Libraries, WC Docket No. 13-184, Report and Order and Further Notice of Proposed Rulemaking, FCC 14-99 para. 151,153 (rel. Jul. 23, 2014).

- FCC rules provide that only schools meeting the statutory definition of “elementary school” or “secondary school” as defined in section 47 C.F.R. sec. 54.500(c) or (k) and not excluded under paragraphs (a)(2) or (a)(3) of this section shall be eligible for discounts on telecommunications and other supported services. *See* 47 C.F.R. sec. 54.501(a)(1). The FCC has defined a school as including individual schools, school districts, and consortia of schools and/or school districts. *See* Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, 12 FCC Rcd 8776, 9002, FCC 97-157 para. 425, n.1087 (rel. May 8, 1997). An “elementary school” means an elementary school as defined in 20 U.S.C. § 7801(18), a non-profit institutional day or residential school, including a public elementary charter school, that provides elementary education, as determined under state law. A “secondary school” means a secondary school as defined in 20 U.S.C. § 7801(38), a non-profit institutional day or residential school, including a public secondary charter school, that provides secondary education, as determined under state law except that the term does not include any education beyond grade 12. *See* 47 C.F.R. sec. 54.500(c) and (k). The FCC’s Bootheel Consortium Order directed USAC to permit the applicant to revise its funding request to remove the services for ineligible entities or allow the applicant to provide additional documentation to show why the relevant entity is eligible within 15 calendar days from the date of receipt of notice in writing by USAC. *See* Requests for Review of Decisions of the Universal Service Administrator by Bootheel Consortium, Silver City, New Mexico, et al., Schools and Libraries Universal Service Support Mechanism, File Nos. SLD-309634, et al., CC Docket No. 02-6, Order, 22 FCC Rcd 8747, FCC 07-62 para. 10 (May 8, 2007).

If you wish to appeal this decision, you may file an appeal pursuant to 47 C.F.R. Part 54, Subpart I. Detailed instructions for filing appeals are available at:
<http://www.usac.org/sl/about/program-integrity/appeals.aspx>.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company

cc: Greg Spencer

Exhibit B

FCC Form 470

Approval by OMB
3060-0806

Schools and Libraries Universal Service Description of Services Requested and Certification Form 470

Estimated Average Burden Hours per Response: 3 hours

This form is designed to help you describe the eligible services you seek so that this data can be posted on the Fund Administrator Internet Site and interested service providers can identify you as a potential customer and compete to serve you.

Please read instructions before beginning this form.

Form 470 Application Number: 146500001272220	Applicant's Form Identifier: FY15-1
Application Status: CERTIFIED	Posting Date: 01/28/2015
Allowable Contract Date: 02/25/2015	Certification Received Date: 01/28/2015

Block 1: Applicant Address and Information

1 Name of Applicant:
ELECTRONIC CLASSROOM OF TOMORROW (ECOT)

2 Funding Year: 2015 (Funding years run from July 1 through the following June 30)

3 Entity Number: 221005

4a Street Address, P.O.Box, or Route Number:
3700 SOUTH HIGH STREET, SUITE 95

City: COLUMBUS State: OH Zip Code: 43207 -0000

4b Telephone Number: (614) 492 -8884

4c Fax Number: (614) 492 -8894

5a Eligible Entities That Will Receive Services:
Check the ONE choice in **5a** that best describes the eligible entities that will receive the services described in this form. You will then list in Item **15** the entity/entities that will pay the bills for these services.

☒ Individual School (individual public or non-public school)

☐ School District (LEA; public or non-public [e.g., diocesan] local district representing multiple schools)

☐ Library (including library system, library outlet/branch or library consortium as defined under LSTA)

☐ Consortium (intermediate service agencies, states, state networks, consortia of schools and/or libraries)

☐ Statewide application for (enter 2-letter state code)

representing (check all that apply)

☐ All public schools/districts in the state

☐ All non-public schools in the state

☐ All libraries in the state

5b Recipient(s) of Services - Check all that apply:

☐ Private ☒ Public ☒ Charter

☐ Tribal ☐ Head Start ☐ State Agency

5c Number of eligible entities for which services are sought: 3

Block 1: Applicant Address and Information (continued)

6a Contact Person's Name:
Greg Spencer

If the Contact Person's Street Address is the same as **Item 4a** above, check here. ☐ If not, complete Item 6b.

6b Street Address, P.O.Box, or Route Number:
NOTE: USAC will use this address to mail correspondence
7512 Tottenham Place

City: New Albany State: OH Zip Code: 43054 -9444

Check the box next to your preferred mode of contact and provide your contact information. One box MUST be checked and an entry provided.

☐ **6c** Telephone Number: (614) 989 -5399

☐ **6d** Fax Number: (614) 882 -2556

☒ **6e** E-Mail Address: wgs003@gmail.com

Re-enter E-mail Address: wgs003@gmail.com

If a consultant is assisting you with your application process, please complete Item 7 below:

7 Consultant Name: WGS Consulting

Name of Consultant's Employer: WGS Consulting

Consultant's Street Address: 7512 Tottenham Place

City: New Albany State: OH Zip Code: 43054

Consultant's Telephone Number: (614) 989-5399 Ext.

Consultant's Fax Number: (614) 882-2556

Consultant's E-mail Address: wgs003@gmail.com

Re-enter E-mail Address: wgs003@gmail.com

Consultant Registration Number: 16062188

Entity Number: 221005	Applicant's Form Identifier: FY15-1
Contact Person: Greg Spencer	Phone Number: (614) 989-5399
Block 2: Summary Description of Needs or Services Requested	
8 Category One: Internet Access and/or Telecommunications	
<i>If you check YES to indicate you have a Request for Proposals (RFP) that specifies the services you are seeking, your RFP must be available to all interested bidders for at least 28 days. If your RFP is not available to all interested bidders, or if you check NO and you have or intend to have an RFP, you risk denial of your funding requests.</i>	
a <input type="checkbox"/> YES, I have released or intend to release an RFP for one or more of these services. It is available or will become available on the Internet at: or via (check one) <input type="checkbox"/> the contact person in Item 6 or <input type="checkbox"/> the contact person listed in Item 12 Your RFP Identifier:	
b <input checked="" type="checkbox"/> NO, I have not released and do not intend to release an RFP for any of these services.	
Whether you check YES or NO, you must list below the Internet access and/or telecommunications you seek. Specify each service (e.g., voice service, monthly Internet access service, etc) and quantity and/or capacity (e.g., for voice service, 20 existing lines plus 10 new ones, or for monthly Internet access service, for 500 users).	
Service	Quantity and/or Capacity
Internet Access Service	Minimum of 1.544mbps - All instructional, administrative, and non-instructional facilities
Telephone Services	All instructional, administrative, and non-instructional facilities
Wireless Internet Access Services	All instructional, administrative, and non-instructional facilities
Digital Transmission Services	Minimum of 1.544mbps - All instructional, administrative, and non-instructional facilities
9 [Reserved]	

Entity Number: 221005	Applicant's Form Identifier: FY15-1
Contact Person: Greg Spencer	Phone Number: (614) 989-5399
10 Category Two: Internal Connections and Managed Internal Broadband Services	
<i>If you check YES to indicate you have a Request for Proposals (RFP) that specifies the services you are seeking, your RFP must be available to all interested bidders for at least 28 days. If your RFP is not available to all interested bidders, or if you check NO and you have or intend to have an RFP, you risk denial of your funding requests.</i>	
<p>a <input type="checkbox"/> YES, I have released or intend to release an RFP for one or more of these services. It is available or will become available on the Internet at: or via (check one) <input type="checkbox"/> the contact person in Item 6 or <input type="checkbox"/> the contact person listed in Item 12 Your RFP Identifier:</p> <p>b <input type="checkbox"/> NO, I have not released and do not intend to release an RFP for any of these services.</p> <p>Whether you check YES or NO, you must list below the Internal Connections and Managed Internal Broadband Services you seek. Specify each service (e.g., a router, hub and cabling) and quantity and/or capacity (e.g., connecting 1 classroom of 30 students).</p>	
11 Category Two: Basic Maintenance of Internal Connections	
<i>If you check YES to indicate you have a Request for Proposals (RFP) that specifies the services you are seeking, your RFP must be available to all interested bidders for at least 28 days. If your RFP is not available to all interested bidders, or if you check NO and you have or intend to have an RFP, you risk denial of your funding requests.</i>	
<p>a <input type="checkbox"/> YES, I have released or intend to release an RFP for these services. It is available or will become available on the Internet at: or via (check one) <input type="checkbox"/> the contact person in Item 6 or <input type="checkbox"/> the contact person listed in Item 12 Your RFP Identifier:</p> <p>b <input type="checkbox"/> NO, I have not released and do not intend to release an RFP for these services.</p> <p>Whether you check YES or NO, you must list below the Basic Maintenance services you seek. Specify each service (e.g., basic maintenance of routers) and quantity and/or capacity (e.g., for 10 routers).</p>	

Entity Number: 221005	Applicant's Form Identifier: FY15-1				
Contact Person: Greg Spencer	Phone Number: (614) 989-5399				
<p>12 (Optional) Please name the person on your staff or project who can provide additional technical details or answer specific questions from service providers about the services you are seeking. This person does not need to be the contact person(s) listed in Item 6 nor the Authorized Person who signs this form.</p> <p>Name: Becki Shallenberger</p> <p>Title: Coordinator</p> <p>Telephone Number: (614) 492 - 8884</p> <p>Fax Number: (614) 492 - 8894</p> <p>Email Address: becki.shallenberger@ecotoh.org</p> <p>Re-enter E-mail Address: becki.shallenberger@ecotoh.org</p> <p>13 <input type="checkbox"/> Check this box if there are any restrictions imposed by state or local laws or regulations on how or when service providers may contact you or on other bidding procedures. Please describe below any such restrictions or procedures and/or provide an Internet address where they are posted and a contact name and telephone number.</p> <p><input checked="" type="checkbox"/> Check this box if no state and local procurement/competitive bidding requirements apply to the procurement of services sought on this FCC Form 470.</p> <p>If you are requesting services for a funding year for which an FCC Form 470 cannot yet be filed online, include that information here.</p>					
Block 3:					
14. [Reserved]					
Entity Number: 221005	Applicant's Form Identifier: FY15-1				
Contact Person: Greg Spencer	Contact Phone Number: (614) 989-5399				
Block 4: Recipients of Service					
<p>15 Billed Entities</p> <p>List the entity/entities that will be paying the bills directly to the provider for the services requested in this form. These are known as Billed Entities. At least one line of this item must be completed. If a Billed Entity cited on your FCC Form 471 is not listed below, funding may be denied for the funding requests associated with this FCC Form 470. Attach additional pages if needed.</p> <table><thead><tr><th>Entity Number</th><th>Entity Name</th></tr></thead><tbody><tr><td>221005</td><td>ELECTRONIC CLASSROOM OF TOMORROW (ECOT)</td></tr></tbody></table>		Entity Number	Entity Name	221005	ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
Entity Number	Entity Name				
221005	ELECTRONIC CLASSROOM OF TOMORROW (ECOT)				

Entity Number: 221005		Applicant's Form Identifier: FY15-1	
Contact Person: Greg Spencer		Contact Phone Number: (614) 989-5399	
Block 5: Certifications and Signature			
16	I certify that the applicant includes: (Check one or both.)		
a	<input checked="" type="checkbox"/>	schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. §§ 7801 (18) and (38) , that do not operate as for-profit businesses, and do not have endowments exceeding \$50 million; and/or	
b	<input type="checkbox"/>	libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any schools (including, but not limited to elementary and secondary schools, colleges, and universities).	
17	[Reserved]		
18	<input checked="" type="checkbox"/>	I certify that I will post my FCC Form 470 and (if applicable) make any applicable RFP available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted will be carefully considered and the bid selected will be for the most cost-effective service or equipment offering, with price being the primary factor, and will be the most cost-effective means of meeting educational needs and technology goals.	
19	<input checked="" type="checkbox"/>	I certify that I will retain required documents for a period of at least 10 years (or whatever retention period is required by the rules in effect at the time of this certification) after the last day of service delivered. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the form for, receipt of, and delivery of services receiving schools and libraries discounts. I acknowledge that I may be audited pursuant to participation in the schools and libraries program.	
20	<input checked="" type="checkbox"/>	I certify that the services the applicant purchases at discounts provided by 47 U.S.C. § 254 will be used primarily for educational purposes, see 47 C.F.R. § 54.500, and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. § 54.513. Additionally, I certify that the entity or entities listed on this form have not received anything of value or a promise of anything of value, other than services and equipment sought by means of this form, from the service provider, or any representative or agent thereof or any consultant in connection with this request for services.	
21	<input checked="" type="checkbox"/>	I acknowledge that support under this support mechanism is conditional upon the school(s) and/or library(ies) I represent securing access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that I have considered what financial resources should be available to cover these costs.	
22	<input checked="" type="checkbox"/>	I certify that I am authorized to procure eligible services for the eligible entity(ies). I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this form, that I have examined this request, and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.	
23	<input checked="" type="checkbox"/>	I certify that I have reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that I have complied with them. I acknowledge that persons willfully making false statements on this form may be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	
24	<input checked="" type="checkbox"/>	I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program.	
Entity Number: 221005		Applicant's Form Identifier: FY15-1	
Contact Person: Greg Spencer		Contact Phone Number: (614) 989-5399	
25	Signature of authorized person: <input checked="" type="checkbox"/>		26 Date: 01/28/2015
27a	Printed name of authorized person: Brad C. Scott		
27b	Title or position of authorized person: Director of IT Services <input type="checkbox"/> Check here if the consultant in Item 7 is the Authorized Person.		
27c	Street Address, P.O. Box, Route Number, City, State, Zip Code: 3700 South High Street Suite 95 City: Columbus State: OH Zip Code: 43207		
27d	Telephone Number of Authorized Person: (614) 492-8884		
27e	Fax Number of Authorized Person: (614) 492-8894		
27f	E-mail Address of Authorized Person: Brad.Scott@ecotoh.org Re-enter E-mail Address: Brad.Scott@ecotoh.org		
27g	Name of Authorized Person's Employer: Electronic Classroom of Tomorrow		
<p align="center">Service provider involvement with preparation or certification of an FCC Form 470 can taint the competitive bidding process and result in the denial of funding requests. For more information, refer to the Schools and Libraries area of the USAC web site at www.usac.org/si or call the SLD Client Service Bureau at 1-888-203-8100.</p>			

Entity Number: 221005	Applicant's Form Identifier: FY15-1
Contact Person: Greg Spencer	Phone Number: (614) 989-5399

NOTICE: In accordance with Section 54.503 of the Federal Communications Commission's rules, certain schools and libraries ordering services that are eligible for and seeking universal service discounts must file this Description of Services Requested and Certification Form (FCC Form 470) with the Universal Service Administrator. 47 C.F.R. § 54.503 (c). The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended. 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the competitive bidding requirement contained in 47 C.F.R. § 54.503. Schools and libraries must file this form themselves or as part of a consortium.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving this application is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, information provided in or submitted with this form or in response to subsequent inquiries may also be subject to disclosure consistent with the Communications Act of 1934, FCC regulations, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law.

If you owe a past due debt to the federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized.

If you do not provide the information we request on the form, the FCC may delay processing of your application or may return your form without action.

The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, *et seq.*

Public reporting burden for this collection of information is estimated to average 3 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554.

FCC Form 470
October 2014

New Search

Return To Search Results

Exhibit C

Applicant: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
Billed Entity Number: 221005
Date Submitted: Apr 16, 2015

Application Number: 1009681
Nickname: FY15 -1
Date Certified: Apr 16, 2015

Original Form Data ✓

Current Form Data

Basic Information

[+ Expand All](#) [- Collapse All](#) [^ Scroll to](#)

Billed Entity

Name of Billed Entity: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
Billed Entity Number: 221005
FCC Registration Number: 0014369185
Address 1: 3700 SOUTH HIGH STREET, SUITE 95
City: COLUMBUS **State:** OH **Zip Code:** 43207
Telephone Number: (614) 492-8884 **Ext:** None Provided
Fax Number: (614) 492-8894

Application Type and Recipients of Service

Type of Application: School
Recipients of Services: Charter

Submitter's Email Address: wgs003@gmail.com

Contact Information

Consultant Registration Number: 16062188
Consultant Name: Greg Spencer
Is a consultant acting as the contact person for this application?
Contact Person's Name: Greg Spencer
Contact Person's Email Address: wgs003@gmail.com
Is the contact person's address the same as that of the Billed Entity? No
Contact Person's Address: 7512 Tottenham Place
City: New Albany **State:** OH **Zip Code:** 43054
Contact Person's Telephone Number: (614) 989-5399 **Ext:** 0
Contact Person's Fax Number: (614) 882-2556
Correspondence Address: Consultant Address
Name of person to receive correspondence: Greg Spencer
Holiday / Summer Contact Information:

Discount Calculation

[+ Expand All](#) [- Collapse All](#) [^ Scroll to](#)

Funding Request Category: Category 1

ELECTRONIC CLASSROOM OF TOMORROW (ECOT) - 221005

Entities

Billed Entity Number	Entity Name	NCES Code	Urban or Rural	NIF	State LEA ID	State School ID	Student Count Based on Est. ?	Alt. Disc.	Attributes
221005	ELECTRONIC CLASSROOM OF TOMORROW (ECOT)	390007 903420	U	No		133413	No	Survey	
16064648	ELECTRONIC CLASSROOM OF TOMORROW - REC			Yes			No	Survey	
16084834	ECOT TESTING CENTER - DUBLIN			Yes			No	Survey	Charter School
16084835	ECOT TESTING CENTER - CLEVELAND			Yes			No	Survey	Charter School

Entities

Optional Worksheet

Entity #	Entity Name	Urban Rural	Number of Students Attending This School as Their Home School	If Using CEP, Percentage of Direct Certification Students	Total Number of Students in School Eligible for NSLP
221005	ELECTRONIC CLASSROOM OF TOMORROW (ECOT)	U	16046		10722

Entity #	Entity Name	Urban Rural	Number of Students Attending This School as Their Home School	If Using CEP, Percentage of Direct Certification Students	Total Number of Students in School Eligible for NSLP
16064648	ELECTRONIC CLASSROOM OF TOMORROW - REC				
16084834	ECOT TESTING CENTER - DUBLIN				
16084835	ECOT TESTING CENTER - CLEVELAND				

 [Optional Worksheet](#)

Discount Rate Calculation

Overall Urban/Rural Status	Total Number of Students Enrolled in District	Total Number of Students in District Eligible for NSLP	Percentage of Students in District Eligible for NSLP	Category 1 Discount Rate
U	16046	10722	67%	80%

 [ELECTRONIC CLASSROOM OF TOMORROW \(ECOT\) - 221005](#)

Connectivity Questions

Does the school district (or school, if not part of a district) have Internet access of

- ☒ less than 100 Mbps per 1,000 users (students and staff)
- ☐ at least 100 Mbps per 1,000 users but less than 1Gbps per 1,000 users
- ☐ at least 1 Gbps per 1,000 users

How many of the schools in the school district have Wide Area Networking connections that are scalable to 10 Gbps? 0

How many schools in your school district have LAN/WLAN capacity and coverage

- completely sufficient to support the educational or library activities conducted here? 0
- mostly sufficient to support the educational or library activities conducted here? 0
- sometimes sufficient to support the educational or library activities conducted here? 0
- rarely sufficient to support the educational or library activities conducted here? 0
- not sufficient to support the educational or library activities conducted here? 0

Funding Requests

 [Expand All](#)  [Collapse All](#)  [Scroll to](#)

 [Ver-2 - 2791199](#)

Key Information

Duplicate Funding Request Number:

Service Type: INTERNET ACCESS

Form470 Number: 146500001272220

Exempt470 Reason:

SPIN (Service Provider Identification Number): 143000677

SPIN Name: Verizon Wireless (Cellco Partnership)

Billing Account Number: N/A

Narrative:

Monthly wireless Internet Access service for 17 aircards and 100 USF devices. ECOT is a completely electronic school of more than 16,000 students. This wireless Internet Access is utilized by staff at multiple statewide public location testing sites. Because these sites are temporary locations, this type of Internet Access is the most cost effective method for our staff to monitor, communicate, and report during testing sessions and student visits. It is not possible to install permanent Internet Access services at these locations.

Purchase Type: MONTHLY**When will the services start?** 07/01/2015**When will the services end?** 06/30/2016**Is there a statute, rule, or other restriction which prohibits publication of the pricing information?** No**Type of restriction:****Restriction Citation:**

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Burst Bandwidth?	Last Mile?	Firewall?	Monthly Cost Eligible	One Time Cost Eligible	Extended Cost
					Download Speed	Burst Speed		WAN?	Ineligible	Ineligible	
1	Wireless Service	Data Plan/Air Card Service	Internet	119	5Mbps	Yes	No	No	\$4,678.83	\$0.00	\$56,145.5
					2Mbps	12Mbps		No	\$0.00	\$0.00	

Entity # Entity Name

16064648	ELECTRONIC CLASSROOM OF TOMORROW - REC
221005	ELECTRONIC CLASSROOM OF TOMORROW (ECOT)

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$44,916

Monthly Charges

Total Charges:	\$4,678.83 (monthly)
Ineligible charges:	- \$0.00 (monthly)
Eligible monthly pre-discount amount:	\$4,678.83
Total number of months of service:	x 12
Total annual recurring charges:	\$56,145.96

Total One-time Charges

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$56,145.96
Discount Rate:	x 80%
Funding Commitment Request:	\$44,916.77

Ver-2 - 2791199

Easton-2 - 2791128

Key Information

Duplicate Funding Request Number:

Service Type: VOICE SERVICES

Form470 Number: 146500001272220

Exempt470 Reason:

SPIN (Service Provider Identification Number): 143003988

SPIN Name: Easton Telecom Services, LLC

Billing Account Number: 20061 16001

Purchase Type: MONTHLY

When will the services start? 07/01/2015

When will the services end? 06/30/2016

Narrative:

Long distance services for 506 lines for the Administrative Office.

Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No

Type of restriction:

Restriction Citation:

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed Download Speed	Burst Bandwidth? Burst Speed	Last Mile?	Firewall? WAN?	Monthly Cost Eligible Ineligible	One Time Cost Eligible Ineligible	Extended Cost
1	Voice Service	Local/Long Distance Service	Voice	506		No	No	No No	\$9,000.00 \$0.00	\$0.00 \$0.00	\$108,000.00
Entity # Entity Name											
221005 ELECTRONIC CLASSROOM OF TOMORROW (ECOT)											

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$64,800

Monthly Charges

Total Charges:	\$9,000.00 (monthly)
Ineligible charges:	- \$0.00 (monthly)
Eligible monthly pre-discount amount:	\$9,000.00
Total number of months of service:	x 12
Total annual recurring charges:	\$108,000.00

Total One-time Charges

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$108,000.00
Funding Commitment Request:	\$64,800.00

Discount Rate: x 60%

Funding Commitment Request: \$64,800.00

Easton-2 - 2791128

Ver-1 - 2791160

Key Information

Duplicate Funding Request Number:

Service Type: VOICE SERVICES

Form470 Number: 146500001272220

Exempt470 Reason:

SPIN (Service Provider Identification Number): 143000677

SPIN Name: Verizon Wireless (Cellco Partnership)

Billing Account Number: 981753015-00001

Purchase Type: MONTHLY

When will the services start? 07/01/2015

When will the services end? 06/30/2016

Narrative:

Monthly cellular service for 162 staff telephones.

Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No

Type of restriction:

Restriction Citation:

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Burst Bandwidth?	Last Mile?	Firewall?	Monthly Cost Eligible	One Time Cost Eligible	Extended Cost
					Download Speed	Burst Speed		WAN?	Ineligible	Ineligible	
1	Voice Service	Cellular Voice Service	Voice	131		No	No	No	\$1,718.72	\$0.00	\$20,624.64
								No	\$0.00	\$0.00	

Entity # Entity Name

221005 ELECTRONIC CLASSROOM OF TOMORROW (ECOT)

16064648 ELECTRONIC CLASSROOM OF TOMORROW - REC

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$12,374

Monthly Charges

Total Charges: \$1,718.72 (monthly)

Ineligible charges: - \$0.00 (monthly)

Eligible monthly pre-discount amount: \$1,718.72

Total number of months of service: x 12

Total annual recurring charges: \$20,624.64

Total One-time Charges

Eligible annual pre-discount amount: \$0.00

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$20,624.64
Discount Rate:	x 60%
Funding Commitment Request:	\$12,374.78

Ver-1 - 2791160

Wind-1 - 2791240

Key Information

Duplicate Funding Request Number:**Service Type:** VOICE SERVICES**Form470 Number:** 146500001272220**Exempt470 Reason:****SPIN (Service Provider Identification Number):** 143030766**SPIN Name:** Windstream Communications, LLC**Billing Account Number:** 113944**Purchase Type:** MONTHLY**When will the services start?** 07/01/2015**When will the services end?** 06/30/2016**Narrative:**

Digital transmission services for the Administrative Offices and NIF.

Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No**Type of restriction:****Restriction Citation:**

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Burst Bandwidth?	Last Mile?	Firewall?	Monthly Cost Eligible	One Time Cost Eligible	Extended Cost
					Download Speed	Burst Speed		WAN?	Ineligible	Ineligible	
1	Voice Service	PRI (ISDN)	Voice	4		No	No	No	\$987.88	\$0.00	\$11,854.5
								No	\$0.00	\$0.00	

Entity #	Entity Name
221005	ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
16064648	ELECTRONIC CLASSROOM OF TOMORROW - REC
16084834	ECOT TESTING CENTER - DUBLIN
16084835	ECOT TESTING CENTER - CLEVELAND

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$7,112

Monthly Charges

Total Charges:	\$987.88 (monthly)
Ineligible charges:	- \$0.00 (monthly)
Eligible monthly pre-discount amount:	\$987.88
Total number of months of service:	x 12
Total annual recurring charges:	\$11,854.56

Total One-time Charges

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$11,854.56
Discount Rate:	x 60%
Funding Commitment Request:	\$7,112.74

Wind-1 - 2791240

ATT-1 - 2783637

Key Information

Duplicate Funding Request Number:

Service Type: VOICE SERVICES

Form470 Number: 146500001272220

Exempt470 Reason:

SPIN (Service Provider Identification Number): 143001688

SPIN Name: The Ohio Bell Telephone Company

Billing Account Number: 614 R02-3000, 614 491-9974

Purchase Type: MONTHLY

When will the services start? 07/01/2015

When will the services end? 06/30/2016

Narrative:

Telephone services for Administrative Offices. Monthly POTS service for 12 fax lines.

Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No

Type of restriction:

Restriction Citation:

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed Download Speed	Burst Bandwidth? Burst Speed	Last Mile?	Firewall? WAN?	Monthly Cost Eligible Ineligible	One Time Cost Eligible Ineligible	Extended Cost
1	Voice Service	Local Phone Service Only	Voice	12		No	No	No No	\$420.00 \$0.00	\$0.00 \$0.00	\$5,040.00
Entity #		Entity Name									
221005		ELECTRONIC CLASSROOM OF TOMORROW (ECOT)									

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$3,024

Monthly Charges

Total Charges:	\$420.00 (monthly)
Ineligible charges:	- \$0.00 (monthly)
Eligible monthly pre-discount amount:	\$420.00
Total number of months of service:	x 12
Total annual recurring charges:	\$5,040.00

Total One-time Charges

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$5,040.00
Discount Rate:	x 60%
Funding Commitment Request:	\$3,024.00

ATT-1 - 2783637

Easton-1 - 2791779

Key Information

Duplicate Funding Request Number:

Service Type: VOICE SERVICES

Form470 Number: 146500001272220

Exempt470 Reason:

SPIN (Service Provider Identification Number): 143003988

SPIN Name: Easton Telecom Services, LLC

Billing Account Number: 2010 214000

Purchase Type: CONTRACT

Contract Number: N/A

What is the date you awarded your contract? 03/25/2015

What is the date your contract expires? 06/30/2016

When will the services start? 07/01/2015

Does your contract have any voluntary extensions? No

How many extensions are left on the contract?

What is the total remaining length of the contract if you exercised all extensions (in months)?

Is this Funding Request covered under a master contract? No

Is this Funding Request a continuation of an FRN from a previous funding year based on a multi-year contract? No

Previous FRN Number:

Narrative:

Two ISDN PRI circuits and one DS-3 circuit for voice services for the Administrative Offices and NIF.

Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No

Type of restriction:

Restriction Citation:

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Burst Bandwidth?	Last Mile?	Firewall?	Monthly Cost Eligible	One Time Cost Eligible	Extended Cost
					Download Speed	Burst Speed		WAN?	Ineligible	Ineligible	
2	Voice Service	Long Distance Phone Service Only	Voice	1		No	No	No	\$3,150.00	\$0.00	\$37,800.00
								No	\$0.00	\$0.00	
Entity #		Entity Name									
16064648		ELECTRONIC CLASSROOM OF TOMORROW - REC									
221005		ELECTRONIC CLASSROOM OF TOMORROW (ECOT)									
16084834		ECOT TESTING CENTER - DUBLIN									
16084835		ECOT TESTING CENTER - CLEVELAND									
1	Voice Service	PRI (ISDN)	Voice	2		No	No	No	\$598.00	\$0.00	\$7,176.00
								No	\$0.00	\$0.00	
Entity #		Entity Name									
221005		ELECTRONIC CLASSROOM OF TOMORROW (ECOT)									
16064648		ELECTRONIC CLASSROOM OF TOMORROW - REC									
Item 21 Details											

[Item 21 Details](#)
[Funding Request Summary](#)

Total Post Discount Request: \$26,985

Monthly Charges

Total Charges:	\$3,748.00 (monthly)
Ineligible charges:	- \$0.00 (monthly)
Eligible monthly pre-discount amount:	\$3,748.00
Total number of months of service:	x 12
Total annual recurring charges:	\$44,976.00

Total One-time Charges

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$44,976.00
Discount Rate:	x 60%
Funding Commitment Request:	\$26,985.60

Easton-1 - 2791779

Easton-3 - 2840474

Key Information

Duplicate Funding Request Number:

Service Type: INTERNET ACCESS

Form470 Number: 146500001272220

Exempt470 Reason:

SPIN (Service Provider Identification Number): 143003988

SPIN Name: Easton Telecom Services, LLC

Billing Account Number: 2010 214000

Purchase Type: CONTRACT

Contract Number: N/A

What is the date you awarded your contract? 03/25/2015

What is the date your contract expires? 06/30/2016

When will the services start? 07/01/2015

Does your contract have any voluntary extensions? No

How many extensions are left on the contract?

What is the total remaining length of the contract if you exercised all extensions (in months)?

Is this Funding Request covered under a master contract? No

Is this Funding Request a continuation of an FRN from a previous funding year based on a multi-year contract? No

Previous FRN Number:

Narrative:

Monthly Internet Access Services for Administrative Offices/NIFs

Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No

Type of restriction:

Restriction Citation:

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Burst Bandwidth?	Last Mile?	Firewall?	Monthly Cost Eligible	One Time Cost Eligible	Extended Cost
					Download Speed	Burst Speed		WAN?	Ineligible	Ineligible	
1	Digital Transmission Service	Lit Fiber Service	Transport and Internet	1	3Gbps	No	No	Yes	\$60,177.00	\$0.00	\$722,124.00
					3Gbps			No	\$0.00	\$0.00	

Entity # Entity Name

221005	ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
16064648	ELECTRONIC CLASSROOM OF TOMORROW - REC
16084834	ECOT TESTING CENTER - DUBLIN
16084835	ECOT TESTING CENTER - CLEVELAND

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$577,699

Monthly Charges

Total Charges:	\$60,177.00 (monthly)
Ineligible charges:	- \$0.00 (monthly)
Eligible monthly pre-discount amount:	\$60,177.00
Total number of months of service:	x 12
Total annual recurring charges:	\$722,124.00

Total One-time Charges

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$722,124.00
Discount Rate:	x 80%
Funding Commitment Request:	\$577,699.20

Easton-3 - 2840474

TW-1 - 2740682

Key Information

Duplicate Funding Request Number:

Service Type: INTERNET ACCESS

Form470 Number: 115640001150426

Exempt470 Reason:

SPIN (Service Provider Identification Number): 143030626

SPIN Name:

Billing Account Number:

Purchase Type: CONTRACT

Contract Number: 00003522

What is the date you awarded your contract? 03/25/2015

What is the date your contract expires? 06/30/2017

When will the services start? 07/01/2015

Does your contract have any voluntary extensions? No

How many extensions are left on the contract?

What is the total remaining length of the contract if you exercised all extensions (in months)?

Is this Funding Request covered under a master contract? No

Is this Funding Request a continuation of an FRN from a previous funding year based on a multi-year contract? No

Previous FRN Number:

Narrative:

Internet access for Administrative Office and NIFS.

Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No

Type of restriction:

Restriction Citation:

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Burst Bandwidth?	Last Mile?	Firewall? WAN?	Monthly Cost Eligible	One Time Cost Eligible	Extended Cost
					Download Speed	Burst Speed			Ineligible	Ineligible	
1	Digital Transmission Service	Lit Fiber Service	Transport and Internet	1	500Mbps	No	No	Yes	\$3,036.00	\$0.00	\$36,432.00
					500Mbps			No	\$0.00	\$0.00	

Entity #

Entity Name

221005

ELECTRONIC CLASSROOM OF TOMORROW (ECOT)

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$29,145

Monthly Charges

Total Charges:	\$3,036.00 (monthly)
Ineligible charges:	- \$0.00 (monthly)
Eligible monthly pre-discount amount:	\$3,036.00
Total number of months of service:	x 12
Total annual recurring charges:	\$36,432.00

Total One-time Charges

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$36,432.00
Discount Rate:	x 80%
Funding Commitment Request:	\$29,145.60

TW-1 - 2740682

TW-2 - 2742851

Key Information

Duplicate Funding Request Number:	Does your contract have any voluntary extensions? No
Service Type: INTERNET ACCESS	How many extensions are left on the contract?
Form470 Number: 115640001150426	What is the total remaining length of the contract if you exercised all extensions (in months)?
Exempt470 Reason:	Is this Funding Request covered under a master contract? No
SPIN (Service Provider Identification Number): 143030626	Is this Funding Request a continuation of an FRN from a previous funding year based on a multi-year contract? Yes
SPIN Name:	Previous FRN Number: 2670020
Billing Account Number:	Narrative:
Purchase Type: CONTRACT	Metro Ethernet Point-to-Point 100mbps Access/Single Hub/Single Pa
Contract Number: 00003522	Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No
What is the date you awarded your contract? 03/03/2014	Type of restriction:
What is the date your contract expires? 06/30/2016	Restriction Citation:
When will the services start? 07/01/2015	

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Burst Bandwidth?	Last Mile?	Firewall?	Monthly Cost Eligible	One Time Cost Eligible	Extended Cost
					Download Speed	Burst Speed		WAN?	Ineligible	Ineligible	
1	Digital Transmission Service	Ethernet	Transport and Internet	1	100Mbps	No	No	Yes	\$1,295.00	\$0.00	\$15,540.00
					100Mbps			No	\$0.00	\$0.00	

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed Download Speed	Burst Bandwidth? Burst Speed	Last Mile?	Firewall? WAN?	Monthly Cost Eligible Ineligible	One Time Cost Eligible Ineligible	Extended Cost
Entity #	Entity Name										
221005	ELECTRONIC CLASSROOM OF TOMORROW (ECOT)										

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$12,432

Monthly Charges

Total Charges:	\$1,295.00 (monthly)
Ineligible charges:	- \$0.00 (monthly)
Eligible monthly pre-discount amount:	\$1,295.00
Total number of months of service:	x 12
Total annual recurring charges:	\$15,540.00

Total One-time Charges

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$15,540.00
Discount Rate:	x 80%
Funding Commitment Request:	\$12,432.00

TW-2 - 2742851

TW-3 - 2745196

Key Information

Duplicate Funding Request Number: Service Type: INTERNET ACCESS Form470 Number: 115640001150426 Exempt470 Reason: SPIN (Service Provider Identification Number): 143030626 SPIN Name: Billing Account Number: N/A Purchase Type: CONTRACT Contract Number: 00003522	Does your contract have any voluntary extensions? No How many extensions are left on the contract? What is the total remaining length of the contract if you exercised all extensions (in months)? Is this Funding Request covered under a master contract? No Is this Funding Request a continuation of an FRN from a previous funding year based on a multi-year contract? Yes Previous FRN Number: 2625892 Narrative: Monthly RoadRunner Business Class Internet Access Service
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What is the date you awarded your contract? 03/03/2014
 What is the date your contract expires? 06/30/2016
 When will the services start? 07/01/2015

Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No
 Type of restriction:
 Restriction Citation:

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Burst Bandwidth?	Last Mile?	Firewall?	Monthly Cost Eligible	One Time Cost Eligible	Extended Cost
					Download Speed	Burst Speed		WAN?	Ineligible	Ineligible	
<div><div></div><div>1</div></div>	Digital Transmission Service	Cable Modem	Transport and Internet	3	15Mbps	No	No	Yes	\$669.97	\$0.00	\$8,039.64
					2Mbps			No	\$0.00	\$0.00	
Entity #		Entity Name									
221005		ELECTRONIC CLASSROOM OF TOMORROW (ECOT)									

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$6,431

Monthly Charges

Total Charges:	\$669.97 (monthly)
Ineligible charges:	- \$0.00 (monthly)
Eligible monthly pre-discount amount:	\$669.97
Total number of months of service:	x 12
Total annual recurring charges:	\$8,039.64

Total One-time Charges

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$8,039.64
Discount Rate:	x 80%
Funding Commitment Request:	\$6,431.71

TW-3 - 2745196

TW-4 - 2745223

Key Information

Duplicate Funding Request Number:

Service Type: INTERNET ACCESS

Form470 Number: 115640001150426

Exempt470 Reason:

SPIN (Service Provider Identification Number): 143030626

SPIN Name:

Billing Account Number: N/A

Purchase Type: CONTRACT

Contract Number: 00003522

What is the date you awarded your contract? 03/03/2014

What is the date your contract expires? 06/30/2016

When will the services start? 07/01/2015

Does your contract have any voluntary extensions? No

How many extensions are left on the contract?

What is the total remaining length of the contract if you exercised all extensions (in months)?

Is this Funding Request covered under a master contract? No

Is this Funding Request a continuation of an FRN from a previous funding year based on a multi-year contract? Yes

Previous FRN Number: 2670065

Narrative:

Dedicated Internet Access to NIF located in Dayton, OH

Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No

Type of restriction:

Restriction Citation:

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Burst Bandwidth?	Last Mile?	Firewall?	Monthly Cost Eligible	One Time Cost Eligible	Extended Cost
					Download Speed	Burst Speed		WAN?	Ineligible	Ineligible	
1	Digital Transmission Service	Cable Modem	Transport and Internet	1	50Mbps	No	No	Yes	\$2,227.00	\$0.00	\$26,724.00
					50Mbps			No	\$0.00	\$0.00	

Entity # **Entity Name**

16064648 ELECTRONIC CLASSROOM OF TOMORROW - REC

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$21,379

Monthly Charges

Total Charges:	\$2,227.00 (monthly)
Ineligible charges:	- \$0.00 (monthly)
Eligible monthly pre-discount amount:	\$2,227.00
Total number of months of service:	x 12
Total annual recurring charges:	\$26,724.00

Total One-time Charges

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$26,724.00
Discount Rate:	x 80%
Funding Commitment Request:	\$21,379.20

TW-4 - 2745223

Certifications & Signatures

[Expand All](#) [Collapse All](#) [Scroll to](#)

I certify that the entities listed in Block 4 of this application are eligible for support because they are:

✓ schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. §§ 7801 and (38), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million; and/or

✓ I certify that the entity I represent or the entities listed on this application have secured access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that the entities I represent or the entities listed on this application have secured access to all of the resources to pay the discounted charges for eligible services from funds to which access has been secured in the current funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

A	Total funding year pre-discount amount on this FCC Form 471	\$1,055,500
B	Total funding commitment request amount on this FCC Form 471	\$806,301
C	Total applicant non-discount share	\$249,195
D	Total budgeted amount allocated to resources not eligible for E-rate support	\$5,134,985
E	Total amount necessary for the applicant to pay the non-discount share of the services requested on this application AND to secure access to the resource necessary to make effective use of the discounts	\$5,384,184

☐ Check this box if you are receiving any of the funds in Item E directly from a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year, or if a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year assisted you in locating funds in Item E.

✓ I certify that an FCC Form 470 was posted and that any related RFP was made available for at least 28 days before considering all bids received in selecting a service provider. I certify that all bids submitted were carefully considered and the most cost-effective service offering was selected, with being the primary factor considered, and is the most cost-effective means of meeting educational needs and technology goals.

✓ I certify that the entity responsible for selecting the service provider(s) has reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities listed on this application have complied with them.

✓ I certify that the services the applicant purchases at discounts provided by 47 U.S.C. § 254 will be used primarily for educational purposes, see C.F.R. § 54.500 and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. §§ 54.500, 54.513. Additionally, I certify that the entity or entities listed on this application have not received anything of value or a promise of anything of value, other than services and equipment sought by means of this form, from the service provider, or any representative or agent thereof or any consultant in connection with this request for services.

✓ I certify that I and the entity(ies) I represent have complied with all program rules, including recordkeeping requirements, and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There are signed contracts or other legally binding agreements covering all of the services listed on this FCC Form 471 except for those services provided under non-contracted tariffed or month-to-month arrangements. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.

✓ I acknowledge that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.

✓ I certify that I will retain required documents for a period of at least 10 years (or whatever retention period is required by the rules in effect at time of this certification), after the last day of service delivered. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts, and that if audited, I will make such records available to the Administrator. I acknowledge that I may be audited pursuant to participation in the schools and libraries program.

✓ I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) listed on this application. I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this application, that I have examined this request, that all the information on this form is true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to this application complied with the terms, conditions and purposes of the program, that no kickbacks were paid to anyone and that false statements on this form are punished by fine or forfeiture under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code 18 U.S.C. § 1001 and civil violations of the False Claims Act.

✓ I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities listed on this application or any person associated in any way with my entity and/or the entities listed on this application, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.

✓ I certify that if any of the Funding Requests on this FCC Form 471 are for discounts for products or services that contain both eligible and ineligible components, that I have allocated the eligible and ineligible components as required by the Commission's rules at 47 C.F.R. § 54.504(g)(1), (2).

✓ I certify that the non-discount portion of the costs for eligible services will not be paid by the service provider. The pre-discount costs of eligible services featured on this FCC Form 471 are net of any rebates or discounts offered by the service provider. I acknowledge that, for the purpose of the rule, the provision, by the provider of a supported service, of free services or products unrelated to the supported service or product constitutes a rebate of some or all of the cost of the supported services.

Authorized Person

Name of authorized person: Brad C. Scott

Title or position of authorized person: Director of IT Services

Street address, P.O. Box or Route Number of authorized person (1):

3700 South High Street

Street address, P.O. Box or Route Number of authorized person (2):

Suite 95

City of authorized person: Columbus

State: OH

Zip code of authorized person: 43207

Telephone number: (614) 492-8884

Ext.:

Fax number of authorized person: (614) 492-8894

Email address of authorized person: brad.scott@ecotoh.org

Name of authorized person's employer: Electronic Classroom of Tomorrow

[Back](#)

Exhibit D

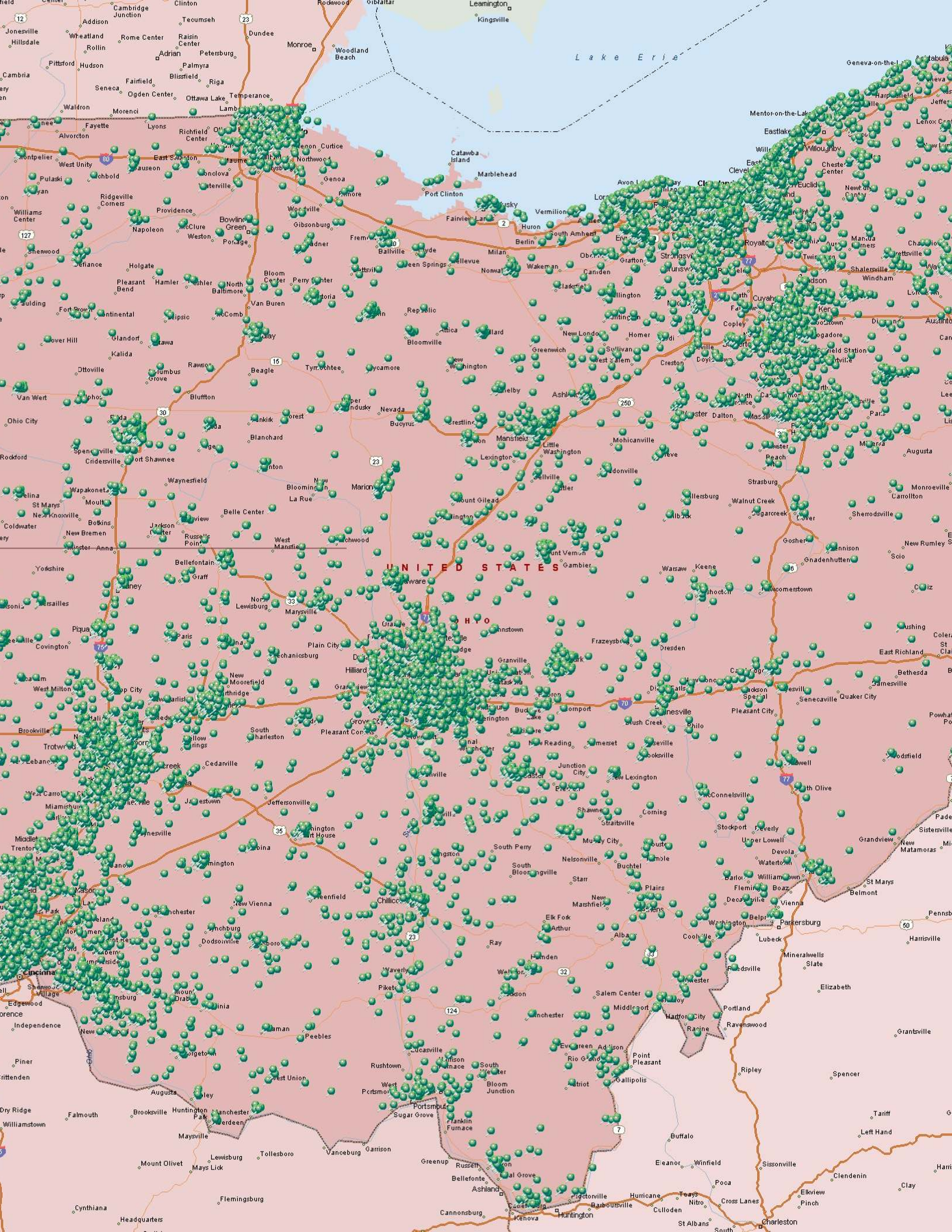


Exhibit E

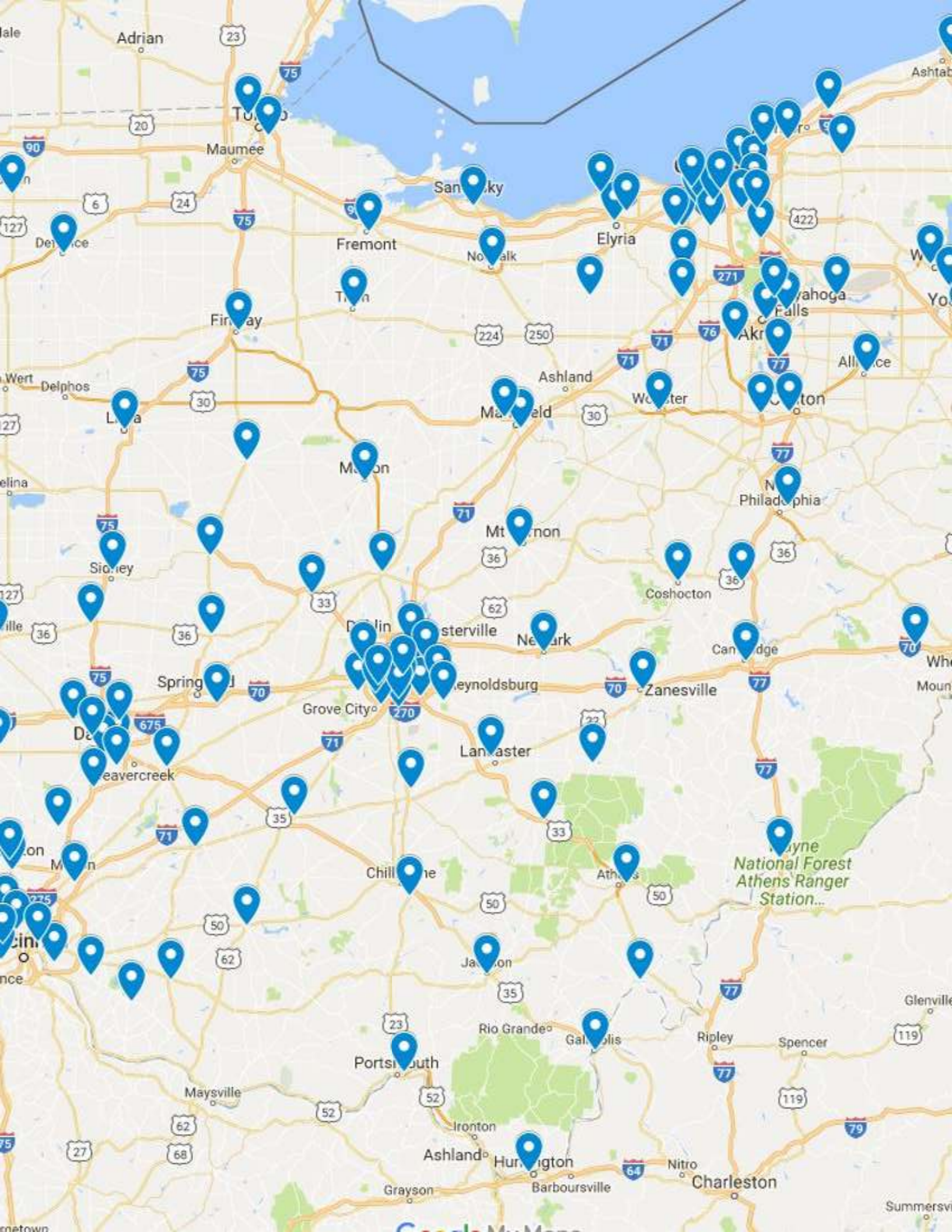


Exhibit F

DECLARATION OF GREG SPENCER

I, Greg Spencer, declare the following:

1. I have a consulting agreement with Electronic Classroom of Tomorrow ("ECOT") through my consulting company, WSG Consulting. I am ECOT's consultant of record and assist them with navigating the E-rate process.
2. For the first time during the 2015 funding year, I was questioned by the Universal Service Administrative Company ("USAC") about the data center location for Easton Telecom.
3. I was told by the USAC helpdesk that ECOT should obtain a billed entity number for the facility.
4. I disagreed with the helpdesk and explained that the data center, which was operated by ECOT's service provider, was simply a colocation facility used to stand-up ECOT's virtual classrooms.
5. I filed for funding for the 2015 Funding Year in the same manner that I had on ECOT's behalf for years past and did not create a new billed entity number for the data center.
6. The 3Gbps/3Gbps connection request by ECOT is necessary to provide students with 24/7 continuous access to ECOT's virtual classroom environment.
7. In a 24-hour period, ECOT transfers approximately 5-6 TB of total data in order to deliver its virtual classroom materials to students located across the state of Ohio.
8. Increasingly, much of the content accessed by students has been HD video classroom content which utilizes between five (5) to eight (8) Mbps.
9. If only 600 of ECOT's over 16,000 currently enrolled students needed simultaneous access to that HD content, ECOT would exceed the 3Gbps connection it purchased.
10. For Funding Year 2015, a brick and mortar school district in central Ohio ("Central Ohio School District") obtained 1GB of bandwidth per school building to supply Internet access for its 14,000 student population at 19 different building locations. The annual cost of 1GB bandwidth for each building was \$34,800.
11. Obtaining a wired Internet access solution at a temporary, leased, pop-up site utilized for a few days out of the year is not physically possible. The owners of these sites provide the space to ECOT on a temporary basis and would not permit ECOT to wire their facility for such a short amount of time. Nor could ECOT obtain a wired Internet access plan for less than a 30-day period of time, which would be necessary for a site leased for only a few days.

12. ECOT currently has a 50MB dedicated Internet access service agreement with Time Warner Cable for a 24-month term for ECOT's Dayton site at a cost of \$1,610/month; \$19,320.00/year.

To the best of my knowledge, I state under penalty of perjury that the Appeal and the foregoing are true and correct.

September 26, 2016



Greg Spencer

Exhibit G

FY 2015 E-rate Application Information Request

Date: 9/11/2015

Contact Name: Greg Spencer

Applicant Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)

FCC Form 471 Application Number(s): 1009681

Response Due Date: 9/26/2015

Dear Greg Spencer:

The Cost Effectiveness Review (CER) team is in the process of reviewing your Funding Year 2015 FCC Form 471 Applications for E-rate discounts. To complete our review, we need additional information, which is listed below.

Review of your below mentioned FCC Form 471 applications raises significant questions about whether your funding request is cost effective. You have submitted the following requests:

471#	FRN	Category	Type of Service	Monthly	Pre-Comitt Request	One time charge
1009681	2840474	Internet Access	Lit Fiber Service	\$60,177.00	\$722,124.00	\$0.00

We are unable to make a positive determination that the funding request(s) is cost effective. However, we are affording you an opportunity to submit further information that would justify your request. A favorable determination requires that we have a full understanding of the specific services for the amount requested, and a justification that establishes that the funding request is cost effective. The information needed to complete this evaluation is as follows for each FRN:

- The funding request listed above appears to be more expensive than we would expect given your description of the services and the number of students served. Please explain how you determined that the services you selected are cost-effective and include an explanation of the factors and special circumstances which lead to your selection.
- Please provide full vendor bills supporting the monthly requested amounts as well as any one time charges.
- Please indicate the total number of staff and teachers located at each entity.
- Please indicate the number of classrooms and building(s) for each entity.
- Based on the documentation provided, FRN 2740682 (Time Warner Cable) and FRN 2840474 (Easton Telecom) are both requests for Lit Fiber Service. Please indicate who will be using the

Lit fiber Service, and what educational use will be for. Please explain the need to have 2 funding requests for Lit Fiber Service with different service providers.

- Based on the documentation provided FRN 2791240 (Windstream) and FRN 2791779 (Easton Telecom) are both requests for PRI (ISDN). Please indicate who will be using the PRI (ISDN) service, and what educational use will be for. Please explain the need to have 2 funding requests for PRI (ISDN) service with different service providers.
- Based on the review of your Funding Year 2015 FCC Form 471 application 1009681 and/or the documentation that you have provided, it appears that the entity(ies) listed below is a cyber-school or cyber library. Program rules do not allow for products or services to be provided to residential homes or for a non-school/non-library building. All entities requesting E-rate funding must meet the statutory definition of an elementary or secondary school found in the No Child Left Behind Act of 2001 (20 U.S.C. Section 7801 (18) and (38)) and they must not be operating as for-profit businesses, and may not have an endowment exceeding \$50 million.

Listed below is the cyber entity(ies):

Entity Name	Entity Number	Physical Address
ELECTRONIC CLASSROOM OF TOMORROW (ECOT)	221005	3700 SOUTH HIGH STREET, SUITE 95 COLUMBUS, OH 43207
ELECTRONIC CLASSROOM OF TOMORROW – REC	16064648	1133 EDWIN C MOSES BLVD DAYTON, OH 45408
ECOT TESTING CENTER – DUBLIN	16084834	2700 EAST DUBLIN-GRANVILLE ROAD COLUMBUS, OH 43231
ECOT TESTING CENTER – CLEVELAND	16084835	4243 FULTON RD CLEVELAND, OH 44144

Questions

To assist us in the review of your application, we need the following information on a school letterhead signed by a school official. If responding via email, please provide the name and title of the entity official providing the response.

#	Questions	Your Response
1	Are the facilities listed above considered to be a school by the State?	____ Yes ____ No
a	If Yes , please provide documentation from the State Department of Education that will verify that the entity(ies) listed above meet the statutory definition of an elementary or secondary school and the physical address of the school.	<input type="checkbox"/> Enclosed
b	If No , please explain why these entities should be considered eligible for E-rate products and services.	<input type="checkbox"/> Enclosed
2	Does the cyber entity operate any non-instructional facilities (NIF) or administrative sites?	____ Yes ____ No

a	If Yes , please provide the entity name, number and physical address of all NIF/administrative sites.	
3	Are the entities listed above requesting any funding for wireless Internet Access services? For example, wireless air card service for students to use.	____ Yes ____ No
a	If Yes , please provide the following information:	
	Funding Request Numbers requesting the wireless Internet Access services.	<input type="checkbox"/> Enclosed
	Where are the students physically located when they are using thee wireless services?	
	If the students use the requested products or services from multiple locations, please list all locations including the entity name and numbers.	
	Also, please provide documentation to support your answer, such as a document that explains how students take classes in your cyber school.	<input type="checkbox"/> Enclosed
4	Does the entity mentioned above provide remote access or services to a non-school, non-library or non-instructional facility location?	____ Yes ____ No
a	If Yes , please indicate so.	
b	If No , please confirm if you agree that the products or services for which you seek discounts for will not be used to provide remote access during the funding year from homes or other non-school, non-library, or non-instructional sites or, if the services are to be used remotely, you will take steps to ensure that ineligible entities such as homes or other non-school, non-library, or non-instructional sites will not have the capability to access these products and services.	____ Yes ____ No

If you disagree, please provide an explanation detailing why.

Please submit the necessary information within the 15 calendar day deadline of this request. Failure to respond may result in a reduction or denial of your funding request(s).

- Additionally, you will need to provide us with competitive bidding documentation you retained for FRN 2840474.

Information Request Checklist - Please complete and return with your responses.
On the first page of each document you provide please write the corresponding FRN(s) the document pertains to.

Item #	Items to be returned to the Cost Effective Reviewer	Document(s) Title & Corresponding FRN	Status								
1	Signed & dated contracts and/or other agreements with service providers related to the FCC Form(s) 471		<input type="checkbox"/> Enclosed <input type="checkbox"/> N/A								
2	Request For Proposal (RFP) Please specify: Release date: mo. ____/day ____/year ____ Bid due date: mo. ____/day ____/year ____		<input type="checkbox"/> Enclosed <input type="checkbox"/> N/A								
3	All bid responses received for all funding requests listed above. If no bids were received for any FRN, please indicate so in writing. It may be helpful to include a chart as indicated below: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>App #</th><th>FRN #</th><th>#of bids received</th><th>Vendor selected</th></tr> </thead> <tbody> <tr> <td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>	App #	FRN #	#of bids received	Vendor selected						<input type="checkbox"/> Enclosed <input type="checkbox"/> N/A
App #	FRN #	#of bids received	Vendor selected								
4	Vendor selection process description (created during the bidding process)		<input type="checkbox"/> Enclosed <input type="checkbox"/> N/A								
5	Was a consultant used relating to the planning, implementation and support of your E-rate funding requests? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, provide a signed and dated Consultant Agreement(s) or Letter of Agency.		<input type="checkbox"/> Enclosed <input type="checkbox"/> N/A								
6	Certification (page) (Include signature, title, date and please complete all sections.)		<input type="checkbox"/> Enclosed								

Information Regarding your Competitive Bidding and Vendor Selection Process Documentation

For each of the following items we have outlined the requested documentation you will need to supply.

- Please provide the information by funding request number (FRN) unless otherwise indicated.
- In the event that a document (e.g. contract, RFP, bid response, etc.) applies to multiple FRNs, simply indicate on the first page of the document which FRN(s) is supported by the document.
- If, for any reason, you do not have any of the documentation requested below, you MUST provide a complete explanation for why it is missing.
- For FRN's that reference a prior year FCC Form 470, please provide the competitive bidding and vendor selection documentation for the year that established bidding for those FRN's as well.

1) CONTRACTS AND/OR OTHER AGREEMENTS

- Signed and dated copies of any and all agreements related to each of the FCC Form 471 funding request(s), including any and all contracts, agreements, Statements of Work, etc.

- If using a State Maser Contract (SMC), please provide the contract number so that we can verify the contract award dates and expiration dates. If you have a web link or supporting documentation to the SMC, please include that in your response.

2) REQUESTS FOR PROPOSAL (RFP)

- Copies of any and all requests for proposals (RFPs), invitations to bid, requests for bids, or other documentation of bid requests for services and/or products requested, or other solicitations in any way associated with the applicant's funding request(s) and/or the selection of the service provider(s) that appear(s) on the applicant's funding request(s).
- Provide any and all amendments made to the original RFP.
- All RFPs should indicate when they were first made available to service providers, i.e. release and posting date as well as the due date for which bids must be submitted.

3) BID RESPONSES

- Indicate the number of bids/proposals received for all funding requests
- Provide complete copies of any and all proposals, bid responses, etc., received in response to the FCC Form 470, and/or any RFP, or other solicitation in any way associated with the applicant's funding request and/or with the selection of the service provider that appears on the applicant's funding requests.
- This information should be provided for all funding requests including tariff, month-to-month and contracted services.

4) VENDOR SELECTION PROCESS

- Please provide your bid evaluation matrix that was used to select your vendor.
- Include all bids that you received and any other bid documentation such as attendance sheets, correspondences to and from the bidding vendor, and a description of your bid evaluation process.
- This information should be provided for all funding requests including tariff, month-to-month, and contracted services.

5) CONSULTING AGREEMENTS

- Please indicate if a consultant was used for the planning, implementation, and support of your E-rate funding request(s) and provide a signed and dated copy of any consulting agreement(s) or Letters of Agency.
- If a consultant was not used, please indicate as such.

Complete and return the enclosed Certification to the Schools and Libraries Division (SLD). If the applicant's authorized representative completed the information in this document, please *attach a copy of the letter of agency or other agreement* between the applicant and consultant authorizing them to act on the school or library's behalf.

Please note that if an authorized representative signs this form, an authorized school or library official is also required to sign in the space provided below.

Note: If a consultant was used, a school official **MUST** sign below.

CERTIFICATION	
<p>I certify that I am authorized to make the representations set forth in the responses to the inquiry on behalf of ELECTRONIC CLASSROOM OF TOMORROW (ECOT) the entity represented on and responding to the inquiry, and am the most knowledgeable person with regard to the information set forth therein. I certify that the responses and supporting documentation to the inquiry are true and correct to the best of my knowledge, information and belief. I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I acknowledge that false statements can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001 and civil violations of the False Claims Act.</p> <p>I declare under penalty of perjury that the foregoing is true and correct. Executed on ____ day of _____, 2015 at _____ [city], _____ [state].</p>	
Signature	Date
Print Name	Title
Employer	
Telephone Number	Fax Number
Email Address	
Address	
Authorized School or Library Official's Signature and Title	Date
Print Name of Authorized School or Library Official Named Above	

Please email or fax the requested information to my attention. If you have any questions or you do not understand what we are requesting, please feel free to contact me.

It is important that we receive all of the information requested **within 15 calendar days** so we can complete our review of your application(s). **Failure to send all of the information requested may result in a reduction or denial of funding. If you need additional time to prepare your response, please let me know as soon as possible. If you are unable to provide the requested information because your school or library has closed for summer break, please indicate in writing the timeframe that you will be unavailable to respond.**

Additionally, please note that you are required to retain all documents related to the application for, receipt and delivery of supported services as well as any other documents that demonstrate compliance with the requirements of the program for at least 10 years after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request.

Thank you for your cooperation and continued support of the Universal Service Program.

Sincerely,

Nancy Rivera
Associate Manager, Cost Effectiveness Review
USAC, Schools and Libraries Division
Phone: 973-581-5055
Fax: 973-599-6520
E-mail: nancy.rivera@sl.universalservice.org

Exhibit H

Ms. Rivera,

As you know, ECOT is a non-traditional, virtual on-line school with 16,000-plus students. Classes are available anytime and anywhere to our students.

The response to your inquiry is at the end of each of the appropriate items and in bold, blue type. Please do not hesitate to contact me with any issues or questions at 614.989.5399 or wgs003@gmail.com.

Included in our response is the following documents (listed in order of appearance):

ECOT Letter from Brad C. Scott – Director of IT
Email from Lorrie Germann, Ohio State E-Rate Coordinator
Funding Year 2015 Bid Comparisons – FRNs 2740682 & 2840474
Funding Year 2014 Bid Comparisons – FRNs 2791240 & 2791779
Time Warner Cable Contract – FRN 2740682
Easton Contract – FRN 2840747
Windstream Contract – FRN 2791240
Easton Contract – FRN 2791779

Thank you for all your help,

Greg Spencer
614.989.5399
CRN 16062188

FY 2015 E-rate Application Information Request

Date: 9/11/2015

Contact Name: Greg Spencer

Applicant Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)

FCC Form 471 Application Number(s): 1009681

Response Due Date: 9/26/2015

Dear Greg Spencer:

The Cost Effectiveness Review (CER) team is in the process of reviewing your Funding Year 2015 FCC Form 471 Applications for E-rate discounts. To complete our review, we need additional information, which is listed below.

Review of your below mentioned FCC Form 471 applications raises significant questions about whether your funding request is cost effective. You have submitted the following requests:

471#	FRN	Category	Type of Service	Monthly	Pre-Comitt Request	One time charge
1009681	2840474	Internet Access	Lit Fiber Service	\$60,177.00	\$722,124.00	\$0.00

We are unable to make a positive determination that the funding request(s) is cost effective. However, we are affording you an opportunity to submit further information that would justify your request. A favorable determination requires that we have a full understanding of the specific services for the amount requested, and a justification that establishes that the funding request is cost effective. The information needed to complete this evaluation is as follows for each FRN:

- The funding request listed above appears to be more expensive than we would expect given your description of the services and the number of students served. Please explain how you determined that the services you selected are cost-effective and include an explanation of the factors and special circumstances which lead to your selection.
- Please provide full vendor bills supporting the monthly requested amounts as well as any one time charges.
- Please indicate the total number of staff and teachers located at each entity.
- Please indicate the number of classrooms and building(s) for each entity.
- Based on the documentation provided, FRN 2740682 (Time Warner Cable) and FRN 2840474 (Easton Telecom) are both requests for Lit Fiber Service. Please indicate who will be using the Lit fiber Service, and what educational use will be for. Please explain the need to have 2 funding requests for Lit Fiber Service with different service providers.
- Based on the documentation provided FRN 2791240 (Windstream) and FRN 2791779 (Easton Telecom) are both requests for PRI (ISDN). Please indicate who will be using the PRI (ISDN) service, and what educational use will be for. Please explain the need to have 2 funding requests for PRI (ISDN) service with different service providers.

Please refer to the attached letter on ECOT letterhead for our response to the first six bulleted requests. PLEASE NOTE: The reference in the fifth bulleted request to FRN 2940474 should actually reference FRN 2840474.

- Based on the review of your Funding Year 2015 FCC Form 471 application 1009681 and/or the documentation that you have provided, it appears that the entity(ies) listed below is a cyber-school or cyber library. Program rules do not allow for products or services to be provided to residential homes or for a non-school/non-library building. All entities requesting E-rate funding must meet the statutory definition of an elementary or secondary school found in the No Child Left Behind Act of 2001 (20 U.S.C. Section 7801 (18) and (38)) and they must not be operating as for-profit businesses, and may not have an endowment exceeding \$50 million.

Listed below is the cyber entity(ies):

Entity Name	Entity Number	Physical Address
ELECTRONIC CLASSROOM OF TOMORROW (ECOT)	221005	3700 SOUTH HIGH STREET, SUITE 95 COLUMBUS, OH 43207
ELECTRONIC CLASSROOM OF TOMORROW – REC	16064648	1133 EDWIN C MOSES BLVD DAYTON, OH 45408
ECOT TESTING CENTER – DUBLIN	16084834	2700 EAST DUBLIN-GRANVILLE ROAD COLUMBUS, OH 43231
ECOT TESTING CENTER – CLEVELAND	16084835	4243 FULTON RD CLEVELAND, OH 44144

Questions

To assist us in the review of your application, we need the following information on a school letterhead signed by a school official. If responding via email, please provide the name and title of the entity official providing the response.

#	Questions	Your Response
1	Are the facilities listed above considered to be a school by the State?	<u> X </u> Yes <u> </u> No
a	If Yes , please provide documentation from the State Department of Education that will verify that the entity(ies) listed above meet the statutory definition of an elementary or secondary school and the physical address of the school.	<u> X </u> Enclosed The enclosed email from Lorrie Germann, Ohio E-Rate Coordinator, was sent on 09/28/2015 for verification of statutory requirements.
b	If No , please explain why these entities should be considered eligible for E-rate products and services.	<u> </u> Enclosed
2	Does the cyber entity operate any non-instructional facilities (NIF) or administrative sites?	<u> X </u> Yes <u> </u> No
a	If Yes , please provide the entity name, number and physical address of all NIF/administrative sites.	REC - 16064648 1133 EDWIN C MOSES BLVD DAYTON, OH 45408 DUBLIN - 16084834 2700 EAST DUBLIN-GRANVILLE ROAD COLUMBUS, OH 43231 CLEVELAND - 16084835

Response due: 9/26/2015

		4243 FULTON RD CLEVELAND, OH 44144
3	Are the entities listed above requesting any funding for wireless Internet Access services? For example, wireless air card service for students to use.	____ Yes <u>X</u> No
a	If Yes , please provide the following information:	
	Funding Request Numbers requesting the wireless Internet Access services.	<input type="checkbox"/> Enclosed
	Where are the students physically located when they are using thee wireless services?	
	If the students use the requested products or services from multiple locations, please list all locations including the entity name and numbers.	
	Also, please provide documentation to support your answer, such as a document that explains how students take classes in your cyber school.	<input type="checkbox"/> Enclosed
4	Does the entity mentioned above provide remote access or services to a non-school, non-library or non-instructional facility location?	____ Yes <u>X</u> No
a	If Yes , please indicate so.	
b	If No , please confirm if you agree that the products or services for which you seek discounts for will not be used to provide remote access during the funding year from homes or other non-school, non-library, or non-instructional sites or, if the services are to be used remotely, you will take steps to ensure that ineligible entities such as homes or other non-school, non-library, or non-instructional sites will not have the capability to access these products and services.	<u>X</u> Yes ____ No

If you disagree, please provide an explanation detailing why.

Please submit the necessary information within the 15 calendar day deadline of this request. Failure to respond may result in a reduction or denial of your funding request(s).

- Additionally, you will need to provide us with competitive bidding documentation you retained for FRN 2840474.

Information Request Checklist - Please complete and return with your responses.
On the first page of each document you provide please write the corresponding FRN(s) the document pertains to.

Item #	Items to be returned to the Cost Effective Reviewer	Document(s) Title & Corresponding FRN	Status								
1	Signed & dated contracts and/or other agreements with service providers related to the FCC Form(s) 471		<input checked="" type="checkbox"/> Enclosed <input type="checkbox"/> N/A								
2	Request For Proposal (RFP) Please specify: Release date: mo. ____/day ____/year ____ Bid due date: mo. ____/day ____/year ____		<input type="checkbox"/> Enclosed <input checked="" type="checkbox"/> N/A								
3	All bid responses received for all funding requests listed above. If no bids were received for any FRN, please indicate so in writing. It may be helpful to include a chart as indicated below: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>App #</th><th>FRN #</th><th>#of bids received</th><th>Vendor selected</th></tr> </thead> <tbody> <tr> <td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>	App #	FRN #	#of bids received	Vendor selected						<input type="checkbox"/> Enclosed <input type="checkbox"/> N/A
App #	FRN #	#of bids received	Vendor selected								
4	Vendor selection process description (created during the bidding process)	ECOT's vendor selection process is comprised of a committee which includes personnel from the Technology and Innovations Departments reviewing all bids. Funding Year 2015 did not produce any multiple vendor bids for any 470 item. All bids were in the form of final contracts.	<input checked="" type="checkbox"/> Enclosed <input type="checkbox"/> N/A								
5	Was a consultant used relating to the planning, implementation and support of your E-rate funding requests? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, provide a signed and dated Consultant Agreement(s) or Letter of Agency.		<input type="checkbox"/> Enclosed <input checked="" type="checkbox"/> N/A								
6	Certification (page) (Include signature, title, date and please complete all sections.)		<input checked="" type="checkbox"/> Enclosed								

Information Regarding your Competitive Bidding and Vendor Selection Process Documentation

For each of the following items we have outlined the requested documentation you will need to supply.

- Please provide the information by funding request number (FRN) unless otherwise indicated.
- In the event that a document (e.g. contract, RFP, bid response, etc.) applies to multiple FRNs, simply indicate on the first page of the document which FRN(s) is supported by the document.
- If, for any reason, you do not have any of the documentation requested below, you **MUST** provide a complete explanation for why it is missing.

- For FRN's that reference a prior year FCC Form 470, please provide the competitive bidding and vendor selection documentation for the year that established bidding for those FRN's as well.

1) CONTRACTS AND/OR OTHER AGREEMENTS

- Signed and dated copies of any and all agreements related to each of the FCC Form 471 funding request(s), including any and all contracts, agreements, Statements of Work, etc.
- If using a State Maser Contract (SMC), please provide the contract number so that we can verify the contract award dates and expiration dates. If you have a web link or supporting documentation to the SMC, please include that in your response.

2) REQUESTS FOR PROPOSAL (RFP)

- Copies of any and all requests for proposals (RFPs), invitations to bid, requests for bids, or other documentation of bid requests for services and/or products requested, or other solicitations in any way associated with the applicant's funding request(s) and/or the selection of the service provider(s) that appear(s) on the applicant's funding request(s).
- Provide any and all amendments made to the original RFP.
- All RFPs should indicate when they were first made available to service providers, i.e. release and posting date as well as the due date for which bids must be submitted.

3) BID RESPONSES

- Indicate the number of bids/proposals received for all funding requests
- Provide complete copies of any and all proposals, bid responses, etc., received in response to the FCC Form 470, and/or any RFP, or other solicitation in any way associated with the applicant's funding request and/or with the selection of the service provider that appears on the applicant's funding requests.
- This information should be provided for all funding requests including tariff, month-to-month and contracted services.

4) VENDOR SELECTION PROCESS

- Please provide your bid evaluation matrix that was used to select your vendor.
- Include all bids that you received and any other bid documentation such as attendance sheets, correspondences to and from the bidding vendor, and a description of your bid evaluation process.
- This information should be provided for all funding requests including tariff, month-to-month, and contracted services.

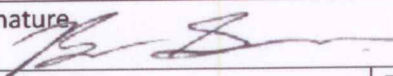
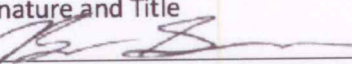
5) CONSULTING AGREEMENTS

- Please indicate if a consultant was used for the planning, implementation, and support of your E-rate funding request(s) and provide a signed and dated copy of any consulting agreement(s) or Letters of Agency.
- If a consultant was not used, please indicate as such.

Complete and return the enclosed Certification to the Schools and Libraries Division (SLD). If the applicant's authorized representative completed the information in this document, please *attach a copy of the letter of agency or other agreement* between the applicant and consultant authorizing them to act on the school or library's behalf.

Please note that if an authorized representative signs this form, an authorized school or library official is also required to sign in the space provided below.

Note: If a consultant was used, a school official **MUST** sign below.

CERTIFICATION	
<p>I certify that I am authorized to make the representations set forth in the responses to the inquiry on behalf of ELECTRONIC CLASSROOM OF TOMORROW (ECOT) the entity represented on and responding to the inquiry, and am the most knowledgeable person with regard to the information set forth therein. I certify that the responses and supporting documentation to the inquiry are true and correct to the best of my knowledge, information and belief. I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I acknowledge that false statements can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001 and civil violations of the False Claims Act.</p> <p>I declare under penalty of perjury that the foregoing is true and correct. Executed on <u>1</u> day of <u>October</u>, 2015 at <u>Columbus</u> [city], <u>Ohio</u> [state].</p>	
Signature 	Date October 1, 2015
Print Name Brad C. Scott	Title IT Director
Employer Electronic Classroom of Tomorrow	
Telephone Number (614) 492-8884	Fax Number (614) 492-8894
Email Address brad.scott@ecotoh.org	
Address 3700 South High Street, Suite 95, Columbus, Ohio 43207	
Authorized School or Library Official's Signature and Title 	Date October 1, 2015
Print Name of Authorized School or Library Official Named Above Brad C. Scott	

Response due: 9/26/2015

Please email or fax the requested information to my attention. If you have any questions or you do not understand what we are requesting, please feel free to contact me.

It is important that we receive all of the information requested **within 15 calendar days** so we can complete our review of your application(s). **Failure to send all of the information requested may result in a reduction or denial of funding. If you need additional time to prepare your response, please let me know as soon as possible. If you are unable to provide the requested information because your school or library has closed for summer break, please indicate in writing the timeframe that you will be unavailable to respond.**

Additionally, please note that you are required to retain all documents related to the application for, receipt and delivery of supported services as well as any other documents that demonstrate compliance with the requirements of the program for at least 10 years after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request.

Thank you for your cooperation and continued support of the Universal Service Program.

Sincerely,

Nancy Rivera
Associate Manager, Cost Effectiveness Review
USAC, Schools and Libraries Division
Phone: 973-581-5055
Fax: 973-599-6520
E-mail: nancy.rivera@sl.universalservice.org

9/24/2015

To: Nancy Rivera, Associate Manager, Cost Effectiveness Review

Subject: Electronic Classroom of Tomorrow (ECOT)

FY 2015 E-Rate Application Information Request

DCC Form 471 Application Number: 1009681

Dear Nancy Rivera:

In response to bulleted concerns brought forth by the Cost Effectiveness Review, information provided below should address each concern in the order listed. Each FRN addressed is aligned with the corresponding bullet in the request unless explicitly noted. Additional information to address other requested information is contained in subsequent attachments.

- As ECOT is an online school, FRN 2840474 is for a 3Gb internet circuit that serves ECOT's student and teacher population. Current enrollment of the school is approximately 15,000 students with 870 teaching staff. Because ECOT brings all student and teacher network traffic into the environment for filtering and device management, this adds significant network bandwidth overhead. Average utilization of this circuit is currently 1.5Gb, allowing the additional 1.5Gb for growth throughout the school year and peak utilization above average. Increasingly multimedia heavy lessons, utilizing HD video, and synchronous live sessions, that can account for 900Mb of bandwidth during their peak, drive much of this traffic. Given that students in ECOT's environment do all of their work via the internet, and all of that traffic passes through ECOT's network, the usage pattern is very different from a traditional school.

In addition, the circuit utilized through Easton is a multicarrier (6 different carriers) aggregated circuit with each having multiple diverse pathways into the datacenter. This makes the service from Easton uniquely positioned to minimize risk and optimize performance, which is critical to the success of ECOT's students.

- Please see the most recent bill for services, attached to this document.
- This circuit is connected at ECOT's datacenter, which is not identified as an ECOT facility due to being leased colocation space. The logical, rather than physical, positioning of this circuit places it in a key function serving all of ECOT's 15,000 students and 870 teaching staff. Other circuits serve ECOT's identified entities that house additional staff, which may direct some traffic back to the datacenter over the internet through the identified circuit.
- This is not applicable for FRN 2840474.

- The limited categories available on the filing application do not adequately describe the circuits included in FRN 2840474 and FRN 2740682. While the selection enables the identification of the Time Warner Cable circuit in FRN 2740682 as an internet circuit, it is actually a point to point circuit connecting our administrative office (Entity 221005) to the datacenter. This link between facilities is critical to administrative use of the equipment at the datacenter that serves additional functions beyond what is housed in the administrative office and facilitates cross-site backup of data. As previously outlined, FRN 2940474 is related to our Internet facing circuit at the datacenter, so both Lit Fiber Services have different, unique functions.
- Services on FRN 2791240 (Windstream) and FRN 2791779 (Easton) for PRI (ISDN) service are utilized to maintain telephone to ECOT's students and families. Because students and teachers are working from home, voice communication is as important a communication medium as other digital communication. Through phones connected into headquarters, each teacher has an extension the ECOT's families can call to speak to a teacher directly, and other departments interact with the families similarly. The PRI circuits identified also support communication with ECOT's general information and support call center, counseling department, truancy department, technical helpdesk, principals, testing department, and various personnel supporting the student experience.

Two funding requests for different providers have been requested on PRI (ISDN) service, because the service provided is different. Windstream (FRN 2791240) is able to provide circuits that offer local carrier access at a better rate than other carriers for the same service. Likewise, Easton (FRN 2791779) is able to offer a better rate on long distance service, and the circuits through Easton are only configured for long distance coverage. With students calling ECOT from all areas in Ohio, both services are necessary to provide the best experience at the optimal cost in serving ECOT's student population.

Thank you for your support in facilitating our E-Rate request.

Sincerely,



Brad Scott
Electronic Classroom Of Tomorrow
Director of IT
Desk: 888-326-8395 x2126
Desk Alt: 614-333-2126
Mobile: 614-264-3340

Lorrie Germann <lgermann@ohiocsc.org>

5:13 PM (14 hours ago)

to nancy.rivera, me

Good Afternoon Nancy,

I am responding on behalf of **ELECTRONIC CLASSROOM OF TOMORROW (ECOT)**, FCC Form 471 Application Number 1009681.

Please consider this reply as verification that **ELECTRONIC CLASSROOM OF TOMORROW (ECOT)**, **Entity No. 221005**, is a valid school in the state of Ohio, meeting the statutory definition of an elementary or a secondary school found in the No Child Left Behind Act of 2001 (20 U.S.C. Section 7801 (18) and (38)). They are not operating as for-profit businesses.

In addition, the following entities qualify as Non-Instructions Facilities, providing administrative support to **ELECTRONIC CLASSROOM OF TOMORROW (ECOT)**:

Entity Name	Entity Number	Physical Address
ELECTRONIC CLASSROOM OF TOMORROW – REC	16064648	1133 EDWIN C MOSES BLVD DAYTON, OH 45408
ECOT TESTING CENTER – DUBLIN	16084834	2700 EAST DUBLIN-GRANVILLE ROAD COLUMBUS, OH 43231
ECOT TESTING CENTER – CLEVELAND	16084835	4243 FULTON RD CLEVELAND, OH 44144

Greg Spencer will respond to the remaining items in your inquiry. However, if I can be of further assistance, please do not hesitate to contact me.

Sincerely,

Lorrie Germann

State E-Rate Coordinator
Ohio Collaborative Services Consortium
lgermann@ohiocsc.org or
lorrie.germann@education.ohio.gov
Office: [740-223-2420](tel:740-223-2420)
Cell: [740-253-1153](tel:740-253-1153)

Funding Year 2015 Bid Comparisons

Service	Provider		Weight %
500 Mbps P2P	TWC		
Price	5	40%	
Relationship	5	20%	
Transition	5	20%	
Term	5	20%	
Total Score	5		
DS3	Easton		
Price	5	40%	
Relationship	5	20%	
Transition	5	20%	
Term	5	20%	
Total Score	5		
2 PRI's @ COLO	Easton		
Price	5	40%	
Relationship	5	20%	
Transition	5	20%	
Term	5	20%	
Total Score	5		
Long Distance Toll Fr	Easton		
Price	5	40%	
Relationship	5	20%	
Transition	5	20%	
Term	5	20%	
Total Score	5		
3 GB @ COLO	Easton		
Price	5	40%	
Relationship	5	20%	
Transition	5	20%	
Term	5	20%	
Total Score	5		
Cellular Phones	Verizon		
Price	5	40%	
Relationship	5	20%	
Transition	5	20%	
Term	5	20%	
Total Score	5		

FRN 2740682

FRN 2840474

Funding Year 2014 PRI Bid Comparison

FRNs 2791240
2791779

Service - 4 Local PRI's	Windsteam	Easton	ICS	Weight %
Price	5	3	1	40%
Relationship	5	5	1	20%
Transition	5	3	3	20%
Term	4	5	5	20%
Total Score	4.8	3.8	2.2	

FRN 2740682



Voice, Data, Video and Business Class Ethernet
Attachment Customer Service Order

Client Information

Customer Name: ECOT Master Service Agreement #: 00003522
Service Address: 3700 S. High St. STE #95 Billing Address: 3700 S. High St. STE #95
City, State, Zip: Columbus, OH 43207 City, State, Zip: Columbus, OH 43207

Procurement Contact: _____ Phone: _____ Email: _____
Billing Contact: Becki Shallenberger Phone: 614-492-8884 Email: Becki.shallenberger@ecotoh.org
Technical Contact: Brad Scott Phone: 614-492-8884 Email: Brad.scott@ecotoh.org

Services

Customer hereby agrees to purchase from TIME WARNER CABLE, and TIME WARNER CABLE agrees to provide to Customer, the following services (the "Services") as listed below on this order form, per the terms and conditions set forth in the Master Service Agreement identified above.

Product/Service	Bandwidth	Service Location Street Address, City, State Zip	Monthly Fee	Installation Fee	Term
ELINE Service		From 3700 S. High St. Columbus OH 43207	\$0.00		
ELINE Service	500 Mbps	To 535 Scherers Ct. Columbus OH 43285	\$3,036.00	\$0	24 Months
Monthly Total			\$3,036.00		

Note: The service will be terminated on a rack mountable device for Customer interface. The device will be located on the Customer premise. It will be the Customer's responsibility to provide power and security.

Property Management / Building Owner Information

Company: _____ Contact: _____ Phone: _____

Term: The Agreement shall be in effect for the Term set forth herein above (the "Initial Term") and, unless terminated earlier in accordance with this Agreement, shall thereafter automatically renew on a month-to-month basis at the then-current rate unless either party notifies the other party at least thirty (30) days prior to the expiration of the then-current period of such party's intent not to renew. In the event that Customer commits to a further Term Commitment at the end of the Initial Term, TWC will negotiate in good faith with Customer.

Service: In the event of a complete failure of the Service Package and/or breach of the attached service SLA due to technical malfunction of the Time Warner Cable Business Class Network operated by TWC, Customer will be entitled to and therefore will request a credit per the guidelines listed in said attachment.

Remarks: Upgrade of service to become effective 07/01/2015

BY SIGNING THIS ORDER FORM THE CUSTOMER INDICATES THAT THEY HAVE READ AND AGREE TO THE TWC MASTER SERVICE AGREEMENT TERMS AND CONDITIONS as well as the services ordered with this attachment. The fees set forth do not include applicable taxes and other similar charges which may be part of the fee charged by TWC hereunder and which shall be the responsibility of the Customer as set forth in this Agreement.

CUSTOMER:
By: [Signature] CRM 3-25-15
Name: Brittany Pierson
Title: Deputy Superintendent; Chief of Staff
Date: 3/25/15

Time Warner Cable Business Class:
By: [Signature]
Name: Andy McNulty
Title: Sales Director
Date: 3/26/15



Internet Term & Service Agreement

THIS INTERNET SERVICE AGREEMENT ("Agreement") is by and between EASTON TELECOM SERVICES, L.L.C. ("Easton") with its principal place of business at Summit II, 3046 Brecksville Road, Unit A, Richfield, Ohio 44266 and ECOT (customer). This agreement is entered into on the date of installation and shall extend through a period of (check one):

(The checking of a box makes this an "Easton Term Plan".)

Term Length (required)

Month to Month ☐ 12 Month ☒ 24 Month ☐ 36 Month ☐ Initials _____

Physical Location

Name ECOT Address 535 Scherers Court Floor _____ Suite _____ Room _____ City Worthington State OH Zip 43085 Onsite Contact _____ Onsite Phone _____ Email _____ Onsite Cell _____

Billing Location

Name ECOT Address 3700 S High Street Floor _____ Suite 95 Room _____ City Columbus State OH Zip 43207 Contact _____ Phone _____

NPA NXX	Service Type (T1, ADSL, Coax, etc.)	Underlying Carrier	Speed	MRC	NRC (Install)
614/492	1 GIG w/BGP	6 Carrier Performance Routing	3GB	\$60,000.00	\$0.00
			IP Address	MRC	NRC (Install)
			64 / 59 usable	\$177.00	\$0.00
			Equipment	MRC	NRC (Install)
			Total	\$60,177.00	\$0.00

Is this new construction? ☐ Yes ☐ No

Requested Due Date: _____ (Note: normal install is a minimum of 30 days from receipt of order)

Shared Line ADSL ☐ Dedicated Line ADSL ☐

Demarc Ext: Yes (add'l charges may apply) ☐ No ☐ If yes, to where? _____

DNS, email and hosting are not available with DIA, DSL, or Coax.

Term: The service shall be provided for the term specified above, unless sooner terminated as provided herein. Upon expiration, the term shall be extended automatically on a month-to-month basis, unless and until either party gives the other no less than 30 days' prior written notice of termination or contract extension.

Should the subscriber discontinue the service within the stated committed time period, Easton reserves the right to bill subscriber for the amount of the monthly fees multiplied by the number of months remaining in the term agreement, less any direct and actual out-of-pocket savings, if any, enjoyed and calculable by Easton as a direct result of not providing the service. The subscriber agrees to pay said invoice upon receipt of billing, as liquidated damages for breach of customer's term commitment.

Limitation of Liability:

Upon occasion, during the installation and/or testing phase of placing your orders in service, costs or expenses are incurred by the Customer (e.g., to verify its equipment or to inspect the functionality of its equipment.) Easton will only be responsible for costs actually and directly incurred by it (and not by the Customer) or for the Customer's costs if, and only if, Easton has accepted that responsibility in writing prior to the Customer incurring those costs.

Interest/Late Fee Charges upon Unpaid Balances

Easton invoices Customers on a monthly basis. Those invoices are due within 25 days of the Invoice Date. Late fees or interest will be charged by Easton on the unpaid balances of its invoices to Customers beginning with the 26th day after the Invoice Date at the rate of 1.5% per month or 18% per annum until payment is received by Easton.

Customer Understands that:

- Easton will make all arrangements with the underlying carrier and local phone companies to install the above services(s) after appropriate credit requirements are met.
- Customer's internet services will be an Easton billed product as represented herein.
- Customer retains control over their internet service and appoints EASTON as their agent in matters regarding the internet service.
- Customer may withdraw from the service at any time with thirty (30) business days prior written notice without further cost or obligation provided customer has not enrolled in an EASTON Term Plan or promotion and all invoices through the date of termination are paid in full.
- Customer will be responsible for Easton's fees based upon costs as presented above. Easton's fees as described above will be payable only after the lines have been installed, and may include a partial months' billing. Fees for service will be based on proposed circuit information and may be altered due to tariff changes or supplier price changes without notice.



Internet Term & Service Agreement

6. Customer's service(s) is(are) subject to disconnection if customer fails to pay their Easton invoices within twenty-five (25) days, after written notice.
7. Customer understands they will be responsible for all fees for service up to the time of disconnection of service including but not limited to all late fees, service fees, installation fees, termination charges and/or liquidated damages in the event of early termination of an Easton Term Plan.
8. The monthly recurring charge for the local loop and dedicated service will commence immediately after local loop acceptance by our underlying carrier.
9. Installation of internet service is contingent upon EASTON's approval of customer's credit.
10. EASTON is not responsible for charges incurred by equipment installation, equipment vendors, local phone companies or any service that was not provided by EASTON for this internet service, nor for any cost expense or loss occurred by reason of or during the installation and testing phase of this agreement not caused by Easton's gross negligence or intentional acts.
11. Credits will be issued in accordance with Easton's Service Level Agreement (SLA).
12. Unless otherwise noted upon expiration of a contract's time period the customer's service shall continue on a month to month basis, unless and until either party gives the other no less than 30 days written notice of termination or contract extension, if the customer's bills from Easton are then current.

Acceptance

BY SIGNATURE BELOW, CUSTOMER ACKNOWLEDGES HAVING READ THE TERMS ON THE ATTACHED AND AGREES TO BE BOUND BY THEM.
IN WITNESS WHEREOF, the parties hereto have executed this Agreement as of the day and year first written below.

ALL RATES ARE SUBJECT TO APPLICABLE TAXES.

Customer Acceptance		Easton Acceptance	
Company Name	ECOT	Easton Telecom Services, L.L.C.	
Signature	<i>[Signature]</i> 3-25-15	Signature	<i>[Signature]</i>
Printed Name	Brittany Pierson	Robert E. Mocas, President	
Title	Deputy Superintendent, Chief of Staff	Date	4-9-15
Date	3/25/15	Distributor	

FRN 2791240

windstream.

T1 Bundle

Customer Information

Customer Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
 Install Street Address: 3700 S HIGH ST City, State, Zip: COLUMBUS, OH 43207
 Main Telephone Number: -- EAN: 113944
 Contact Name: Becki Shallenberger Proposal ID: 2013491
 Account Representative: Richard Hobgood Proposal Type: A - Add Renewal
 Term: 2 Year (s)

Bundled Services	Total Qty	Total Price
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Bundled Services		
B Channel	92	---
D Channel	4	---
Total Bundled Services		\$924.48

Features	Total Qty	Total Price
----------	-----------	-------------

Voice Local Features		
DIDs	312	\$62.40
DIDs	20	\$0.00
Directory Listing	1	\$0.00
ExtendedArea	92	\$0.00
Toll Restriction	92	\$0.00
Voice Long Distance Features		
Directory Assistance - Free Calls	2	\$0.00
Long Distance Blocks	1,000	\$0.00
800 Number	1	\$1.00
Total Features		\$63.40

Total Solution	Total Price
Total Monthly Recurring Charges	\$987.88
Total Non-Recurring Charges	
In the event the customer makes changes to their services during the initial term of agreement, customer is responsible for maintaining a Minimum Monthly Commitment of 85% of their Total Monthly Recurring Charges.	
Minimum Monthly Commitment	\$839.70

Service information

Unless an Upsell is specifically indicated above, if this is a change or addition to Services currently received by Customer at the service location listed on this Proposal, this Proposal supersedes the existing Proposal or Service Schedule related to the location. For Upsells, this Proposal only shows the additions or changes to Services provided at the applicable service location. In all instances, the term set forth herein begins upon the earlier of (i) the Installation Date (which may be the date administrative access to certain software-based is granted to Customer); or (ii) 30 days after delivery of the applicable facility or equipment to the Customer premises (if the delay in connection of the facility and/or equipment is due to Customer or its agent); however, for existing customers, any rate or Product changes ("Changes") will be effective at the start of the next billing cycle after the Changes have been made, which could be at least two bill cycles from the date of this Proposal.

In the event Customer's Services include fees associated with installing enterprise data products, including but not limited to, Ethernet Internet Service, MPLS, Hosted VoIP, VoIP and Data, Managed Security or Managed Router, and unless a Proposal provides otherwise, fifty percent (50%) of Customer's non-recurring costs ("NRCs") shall be paid by Customer on the Effective Date, prior to Company starting any work to install the Services. The remaining fifty percent (50%) of the NRCs shall be paid upon receipt of the first invoice after billing has started pursuant to this Section. Customer's NRCs, if any, will be identified in the Proposal.

Authorized Windstream Representative Name:	<u>Richard Holgado</u>	Date:	<u>2/11/13</u>
Authorized Windstream Representative Signature:	<u>[Signature]</u>		
Authorized Customer Name:	<u>Steven L. Sellers</u>	Date:	<u>2/4/13</u>
Authorized Customer Signature:	<u>[Signature]</u>		



Form Version, Sep 24, 2012

Customer Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)

Address for service: 3700 S HIGH ST, COLUMBUS, OH, 43207

Services to be provided at above location unless different address(es) are indicated on Proposal(s) or Service Schedule. Company's commitment to provide Services is subject to approval of Customer's credit, approval of the suitability of Customer's premises, and receipt of all paperwork.

CUSTOMER SERVICE AGREEMENT

THIS AGREEMENT ("Agreement") is made and entered into as of 7/1/2013 ("Effective Date") by and between **ELECTRONIC CLASSROOM OF TOMORROW (ECOT)** ("Customer") and the Windstream legal entity(ies) providing the Services to Customer, as identified on Customer's bill ("Company"). The Parties agree as follows:

1. Term and Renewal. This Agreement and its Proposal(s) and/or Service Schedules ("Proposals") incorporated herein by reference ("Agreement") are effective on the Effective Date set forth above and will continue for the Term set forth in the Proposal from the date that Services are installed until either terminated pursuant to the provisions below or replaced with a new agreement (the "Term"). Upon expiration of the Term, **this Agreement will automatically renew for successive one-year terms**, (each, a "Renewal Term") until terminated or cancelled pursuant to its terms. In the event a Customer provides written notice of its intent not to renew but does not terminate Services hereunder, Company shall have the option of continuing to provide such Services on a month to month basis, priced at Company's then current monthly rates.

2. Charges for Services; Billing and Payment; Credits Customer is responsible for paying all charges that apply to the Services ordered on a Proposal or used on a per-use basis by Customer, including items such as features, installation, labor, repair, long distance, and directory or operator assistance as specified on the Proposal or set forth in Company's Price Lists or Tariffs. Customer is responsible for taxes, surcharges, fees, and assessments that apply to the sale and use of Services, including how those may change in the future. Company will bill Customer monthly for the Service, payable on receipt of the bill notice. Billing at a location will begin upon the earlier of (i) the Installation Date (which may be the date administrative access to certain software-based Services is granted to Customer); or (ii) 30 days after delivery of the applicable facility and/or equipment to the Customer premises (if the delay in connection of the facility and/or equipment is due to Customer or its agent); however, Company may choose to bill in full monthly increments with no proration for partial service periods when service either starts or ends in the middle of a billing cycle. In certain service areas, paper bills are available only upon request and for a monthly charge and billing for usage will round up to the next cent. If Customer authorizes payment by credit or debit card, then Company will not obtain further consent or provide additional notice before invoicing the credit or debit card for all amounts due and owing. Company reserves the right to increase or decrease monthly recurring charges (MRCs) on at least 30 days' notice and other rates at any time. For Company's business-grade local and long distance voice telecommunications services, T1 and higher facility network Internet access and private networking services, Customer will receive a credit of 1/30th of the monthly recurring charge (MRC) for that month for each day that Customer has a Service Outage, defined below. Only the Service affected by the Service Outage will be eligible for a credit. Credit is based upon the length of time the customer is without Services. Credits in any single month cannot exceed the MRCs for Service that was affected by a Service Outage in that month. For purposes of this Agreement, a "Service Outage" is defined as the complete inability to: (i) make or receive calls; (ii) access the Internet for the purpose of sending or receiving Internet traffic, and (iii) send or receive data across a Company supported private network. Company is not responsible for failure to meet performance objectives for any of the following reasons: (i) Actions, failures to act or delays by customer or others authorized by the Customer to use the Service; (ii) Failure of power, equipment, services or systems not provided by Company including but not limited to other providers' networks and interconnections to or from and connectivity with other Internet Service Providers' networks; (iii) Customer owned or leased equipment or facilities (i.e., Customer's PBX, Local Area Network (LAN)); (iv) During any period in which Company or its agents are not afforded access to the premises where access lines associated with the Services are terminated or the Customer elects not to release the Services for testing and/or repair and the Customer continues to use Services; (v) Maintenance (planned or emergency) or implementation of a Customer order that requires a Services interruption (Company reserves the right to schedule maintenance and upgrades to the network 7 days a week from 12a.m. to 6a.m. in the local time zone of the area being worked on without prior notice to Customer or upon reasonable advance notice outside these time frames); (vi) When a Service Outage has not been reported to Company or where there is a trouble reported, but no trouble found; and (vii) Labor difficulties, governmental orders, civil commotion, acts of God and other circumstances beyond Company's reasonable control.

3. Disputes. To dispute a bill, Customer must do so in good faith and deliver to Company in writing the specific basis for such dispute within 30 days after the date on the bill. If Customer does not follow this dispute process, the dispute shall be deemed waived. Each party has the right to discuss issues directly with the other party and Company may refuse to discuss issues through Customer's external representative.

4. Partial Payments; Late Payments. Company may accept any payments Customer makes as being "payment in full" or as being settlement of any dispute without waiving any rights Company has to either collect the full payments from Customer. Customer is responsible for paying all costs and fees Company incurs as a result of collecting Customer's unpaid charges. If Company does not receive full payment when due or does not receive payment in immediately available funds, Company will add a late payment fee to the amounts owed and will calculate such fee as the total owed times interest at the maximum rate allowable by law.

5. Credits and Deposits. Customer authorizes Company to ask credit-reporting agencies for Customer's credit information. Company may require Customer to submit an initial security deposit and/or advance payment and an additional deposit and/or advance payment if Customer increases Services or Customer's credit rating changes. The deposit will be refunded if satisfactory credit has been established or upon termination of this Agreement for any reason, except that Company at its discretion may apply the deposit to any amount due and unpaid by Customer.

Customer Initials

PRIVATE/PROPRIETARY

Contains Private and/or Proprietary Information. May not be used or disclosed outside NuVox except pursuant to a written agreement.



Form Version, Sep 24, 2012

6. Services Location; Moves. Customer is responsible for providing an environment that is suitable for the Services, including equipment that is compatible with Company's network. Customer shall provide Company with the correct address to obtain Services because Company relies on such information to determine which taxes, fees, surcharges and assessments apply to Services. If Customer does not provide a valid address, Customer will be responsible for any resulting taxes, fees, surcharges, assessments and penalties related thereto. Customer will notify Company if Customer's address changes, in which case Company may either (a) terminate the affected Services; or (b) allow Customer to provide 60 days' advance notice to Company to move Services to a new location and pay any applicable installation charges. Customer will enter into a new Agreement for such new location or Company will apply the liquidated damages set forth in Section 14 for the terminated location. Charges could apply and monthly fees may be affected for moves.

7. Company-Provided and Owned Equipment. Any equipment installed by Company on Customer's premises that is not the subject of a sale or lease to Customer (such as the CSU/DSU, interface cards, Channel Bank and routers, if applicable) shall remain at all times the property of Company. Equipment shall remain in good condition, less normal wear and tear. Company shall be responsible for the maintenance and repair of the equipment unless it is damaged as a result of the action or inaction of Customer or its employees or agents, in which case Customer shall reimburse Company for the cost of any necessary repairs. Customer shall provide Company reasonable access to the equipment for purposes of repair, maintenance, removal or otherwise. If Company does not have access to Customer's premises within 30 days after Customer terminates with Company, Customer shall reimburse Company for the full purchase price of the equipment as well as any attorney's fees and costs.

8. Disconnection of Current Provider; Special Construction; Third Party Charges. Customer is solely responsible for disconnecting Services with its current service provider. Company is not responsible for any charges assessed against Customer by such provider. Customer shall pay all charges if Company or a third party provider is required to extend the demarcation point or undertake special construction for Customer. Unless Company specifically agrees in writing to undertake equipment installation and maintenance work, Customer is responsible for all charges assessed by its phone system vendor and other third parties in connection with the installation of the Services and Company shall have no responsibility for maintenance or repair of same.

9. Internet. Company cannot guarantee speeds or uninterrupted, error-free service. Internet speeds are distance and location-sensitive and speed will vary based on factors such as the condition of wiring inside a specific location, computer configuration, network or Internet congestion, the server speed of the Web sites accessed, and other factors.

10. Google, IF CUSTOMER SUBSCRIBES TO GOOGLE SERVICES THROUGH COMPANY, CUSTOMER WILL BE REQUIRED TO COMPLETE A CLICK-THROUGH AGREEMENT FOR THE GOOGLE LICENSE POSTED AT http://www.windstream.com/legal/Google_Apps_Premier_Edition_License.pdf PRIOR TO USING THE RELEVANT SERVICES. Company may cancel Google Services at any time on 30 days' notice and, at Company's option, may either terminate such Google Services altogether or move Customer to a similar platform. In the event that Company or Customer terminates the Google Services or downgrades or cancels Google Services, Customer is solely responsible for downloading all of its information to its computer within 30 days.

11. American Recovery and Reinvestment Act (ARRA). Customer must notify Company of all restrictions, requirements and reporting obligations to which Company could become subject pursuant to the ARRA before Company provisions Services to Customer. Customer will not use ARRA or stimulus funds, grants or loans, in whole or in part, to support its performance under this Agreement without Company's prior written consent regarding any specifically applicable ARRA terms. If Customer fails to provide such prior written notice to Company of ARRA or stimulus funding or if Company does not consent to the use of such funding, then Company has the right, in its sole discretion, to reject any order or terminate this Agreement and/or any applicable Services, without liability or obligation to Company.

12. Documents Incorporated by Reference; Entire Agreement; Counterparts; Execution. THIS AGREEMENT IS SUBJECT TO AND INCORPORATES THE FOLLOWING BY REFERENCE, AS THEY MAY CHANGE FROM TIME TO TIME: (I) THE TERMS AND CONDITIONS OF THE TARIFFS FILED WITH STATE PUBLIC SERVICE COMMISSIONS; (II) THE FCC OR STATE WEB-POSTED PRICE LISTS OR TERMS AND CONDITIONS (EITHER "PRICE LISTS") POSTED AT <http://www.windstream.com/documents/tariffedservices.pdf>; (III) FOR INTERNET, THE "ACCEPTABLE USE POLICY" POSTED AT <http://www2.windstream.net/customer-support/usersguide/acceptable.html> AND THE "PRIVACY POLICY" POSTED AT <http://www.windstream.com/privacy.aspx>; AND (IV) IF CUSTOMER IS OBTAINING CERTAIN VALUE-ADDED SERVICES (I.E., ONLINE BACK UP SERVICES, TECH HELP, ETC), CUSTOMER WILL BE REQUIRED TO CLICK-THROUGH AGREEMENTS RELATED TO THOSE SERVICES (CLICK-THROUGHS) PRIOR TO ACCESSING SUCH SERVICE, WHICH SHALL BE DEEMED PART OF THIS AGREEMENT. This Agreement, the documents incorporated by reference and any Customer Addendums entered between the parties constitute the Parties' entire Agreement. This Agreement and any Addendums hereto may be amended only in a writing signed by authorized representatives of each party. This Agreement and its incorporated documents supersede any and all statements or promises made to Customer by any Company employee or agent. In the event of any conflict between the provisions of this Agreement and any of the documents incorporated by reference, the provisions of the Google License shall control for Google Services, followed by the Tariffs and Price Lists or Value-Added Services click-through agreements for applicable Services, this Agreement and then the Acceptable Use and Privacy policies. This Agreement may be signed in counterparts, and facsimile or electronic scanned copies may be treated as original signatures. Company also may execute this Agreement via a verifiable electronic signature.

13. Termination. Either party may terminate this Agreement by providing at least 30 days' notice prior to the end of the initial Term or a Renewal Term or if the other party is in breach of any material provision of this Agreement and such other party fails to cure within 30 days after written notice. Notwithstanding, unless prohibited by law, in the event of nonpayment, the breaching party shall have 10 days to cure after written notice. Customer's right to terminate for cause is limited to termination of the affected Services at the affected location only. Company may limit, interrupt or

Customer Initials A. J. J.

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terminate Services immediately if: (a) after any required notice, Customer has not paid for Services; or (b) Customer uses the Services in an adverse manner that affects Company's network or other customers; or (c) Customer or others have used the Services fraudulently or unlawfully while on Customer's premises or while the Services are under Customer's control; or (d) Customer or others use the Services in an excessive, abusive, or unreasonable manner that is not customary for the type of Services; or (e) Customer resells any Services or uses the Services to aggregate other persons' traffic; or (f) Customer uses the Services for its own end users and/or customers as a telecommunications provider or any other kind of provider. In addition to the termination rights of Company set forth above, if Customer or others use the Services in an excessive, abusive, or unreasonable manner that is not customary for the type of Services (including, but not limited to, circumstances in which Company is receiving traffic from Customer that originates from a location other than the local calling area associated with the customer's service location, when 10% or more of Customer's calls are 6 seconds or less, and/or when more than 40% of call attempts are uncompleted per trunk group and DSO/DSO equivalent), company may: (v) charge long-distance charges for such traffic and any additional charges necessary to recoup its administrative costs and any charges from other carriers; (w) charge an additional price per minute in Company's discretion for each call that violates this provision; (x) restrict or cancel use or convert customer to another plan; (y) require customer to pay for the excessive use immediately and make a deposit; and/or (z) void any applicable price guarantee. Company may restore service if customer corrects the violation and pays all outstanding amounts owed, including restoration charges. For Ethernet Internet Access services and MPLS - Virtual Private Network/Virtual LAN Services, Company shall verify the availability of facilities, and in the event that Company determines in its sole discretion that facilities are not economically or technically feasible, Company has the right to terminate this Agreement without liability.

14. Effect of Termination.

a. Pre-Installation - If Customer terminates this Agreement after the Effective Date but prior to the installation of Service(s), Customer will pay Company a Pre-Installation Cancellation Charge (Cancellation Charge) equal to three months of MRCs except that if Company's costs to other providers are greater than this amount, Customer shall also reimburse Company for such costs. Customer agrees that the Cancellation Charge is a reasonable measure of the administrative costs and other fees incurred by Company to prepare for installation. The Cancellation Charge set forth in this Section 14(a) is in lieu of the charges set forth in 14(b) below for post-installation cancellations.

b. Post-Installation - **CUSTOMER UNDERSTANDS THAT ITS RATES ARE BASED UPON ITS COMMITMENT TO PURCHASE SERVICES FOR THE TERM OR RENEWAL TERM. AS SUCH, IF CUSTOMER TERMINATES THIS AGREEMENT OR ANY SERVICES PROVIDED HEREUNDER AFTER INSTALLATION DURING THE INITIAL OR RENEWAL TERM FOR ANY REASON OTHER THAN FOR CAUSE, OR AS A RESULT OF COMPANY'S TERMINATION FOR CUSTOMER'S BREACH, CUSTOMER SHALL PAY TO COMPANY AS LIQUIDATED DAMAGES, AND NOT AS A PENALTY, AN AMOUNT EQUAL TO 100% OF THE MRCs MULTIPLIED BY THE NUMBER OF MONTHS REMAINING IN THE THEN-CURRENT TERM OR RENEWAL TERM ("LIQUIDATED DAMAGES").** CUSTOMER ACKNOWLEDGES THAT ACTUAL DAMAGES WOULD BE DIFFICULT TO DETERMINE AND SUCH LIQUIDATED DAMAGES REPRESENT A FAIR AND REASONABLE ESTIMATE OF THE DAMAGES WHICH MAY BE INCURRED BY COMPANY, INCLUDING BUT NOT LIMITED TO ACTUAL EXPENSES INCURRED BY COMPANY TO INITIATE OR TERMINATE THE SERVICES, THIRD PARTY COSTS, USE OF LIMITED NETWORK RESOURCES, INSTALLATION CHARGES **WAIVED AND ANY DISCOUNTS OR CREDITS GRANTED.** If Customer's Proposal includes Monthly Minimum Charges or Fees ("MMCs" or "MMFs") and Customer terminates or disconnects less than the entirety of its Services such that its actual usage at a location falls below the MMC or MMF for that location, Customer will pay the MMC or MMF every month in lieu of the Liquidated Damages set forth above. If Customer's Proposal does not include MMCs or MMFs and Customer terminates or disconnects less than the entirety of its Services such that its actual usage at a location falls below 50% of its original contracted rate for that location, Customer will pay 50% of the MRCs every month in lieu of the Liquidated Damages set forth above. Additionally, if Customer received a bundled rate for the disconnected Service(s), then Customer's charges may be adjusted by Company to the unbundled service rates.

15. **Limitation of Liability and Indemnity. FOR PURPOSES OF THIS SECTION, DISCLAIMER OF WARRANTIES, AND EMERGENCY, CRITICAL LINES PROVISIONS, "COMPANY" INCLUDES ITS OFFICERS, DIRECTORS, SHAREHOLDERS, EMPLOYEES, AGENTS, SUBCONTRACTORS, VENDORS, AND ANY ENTITY ON WHICH BEHALF COMPANY RESELLS SERVICES. COMPANY'S LIABILITY FOR SERVICES PROVIDED UNDER THIS AGREEMENT WILL NOT EXCEED CUSTOMER'S MRCs DURING THE PERIOD IN WHICH THE DAMAGE OCCURS. IF CUSTOMER'S SERVICE IS INTERRUPTED, COMPANY'S LIABILITY WILL BE LIMITED TO A PRO-RATA CREDIT FOR THE PERIOD OF INTERRUPTION. UNDER NO CIRCUMSTANCES WILL COMPANY BE LIABLE FOR ANY ACCIDENT OR INJURY CAUSED BY SERVICES, ANY INCIDENTAL, SPECIAL OR CONSEQUENTIAL DAMAGES (SUCH AS LOST PROFITS, LOST BUSINESS OPPORTUNITIES, BUSINESS INTERRUPTION, LOSS OF BUSINESS DATA), ANY PUNITIVE OR EXEMPLARY DAMAGES, THE COST OF ALTERNATIVE SERVICE, OR ATTORNEY'S FEES OR FOR ANY DELAY OR FAILURE TO PERFORM UNDER THIS AGREEMENT (INCLUDING BUT NOT LIMITED TO SERVICE INTERRUPTIONS) DUE TO CAUSES BEYOND COMPANY'S REASONABLE CONTROL, INCLUDING BUT NOT LIMITED TO, STRIKES, LOCKOUTS, OTHER LABOR UNREST, CABLE CUTS OR COMMON CARRIER DELAYS. CUSTOMER AGREES THAT THE PRICING OF SERVICES REFLECTS THE INTENT OF THE PARTIES TO LIMIT COMPANY'S LIABILITY AS PROVIDED HEREIN. EACH PARTY WILL DEFEND, INDEMNIFY AND HOLD HARMLESS THE OTHER PARTY, AND ITS RESPECTIVE DIRECTORS, OFFICERS, EMPLOYEES, AND AGENTS, FROM AND AGAINST ALL THIRD-PARTY CLAIMS ARISING OUT OF THE INDEMNIFYING PARTY'S GROSS NEGLIGENCE OR WILLFUL MISCONDUCT WITH RESPECT TO ITS OBLIGATIONS UNDER THIS AGREEMENT. COMPANY IS NOT RESPONSIBLE OR LIABLE IF SERVICES ARE LOST, STOLEN OR MISUSED, EXCEPT WHEN DUE SOLELY TO COMPANY'S NEGLIGENCE OR GROSS MISCONDUCT. CUSTOMER IS RESPONSIBLE FOR ALL USAGE, CHARGES, AND LIABILITY INCURRED FOR SUCH LOSS, MISUSE, OR THEFT OF SERVICES WHILE IN CUSTOMER'S CONTROL, REGARDLESS OF WHETHER WHEN COMPANY NOTIFIES CUSTOMER OF INCREASED USAGE.**

16. **Disclaimer of Warranties. SERVICES ARE PROVIDED ON AN "AS IS" AND "AS-AVAILABLE" BASIS WITHOUT WARRANTIES OF ANY KIND, EXPRESS OR IMPLIED, INCLUDING BUT NOT LIMITED TO WARRANTIES OF TITLE OR NON-INFRINGEMENT OR IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WARRANTY ARISING BY COURSE OF TRADE,**

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COURSE OF DEALING OR COURSE OF PERFORMANCE, ANY WARRANTY THAT THE SERVICES WILL MEET CUSTOMER'S REQUIREMENTS OR ANY WARRANTY REGARDING THE QUALITY, CONTENT, ACCURACY OR VALIDITY OF THE INFORMATION OR DATA RESIDING ON OR PASSING THROUGH OR OVER THE NETWORK AND ALL SUCH WARRANTIES ARE HEREBY DISCLAIMED. WITHOUT LIMITING THE FOREGOING, BROADBAND SPEEDS, TRANSMISSION QUALITY, AND ACCURACY OF ANY DIRECTORY LISTINGS ARE NOT GUARANTEED. NO ORAL OR WRITTEN ADVICE OR INFORMATION BY COMPANY'S EMPLOYEES, AGENTS OR CONTRACTORS SHALL CREATE A WARRANTY, AND CUSTOMER MAY NOT RELY ON ANY SUCH INFORMATION.

17. Emergency, Critical Lines. CUSTOMER ACKNOWLEDGES THAT CERTAIN SERVICES MAY NOT PROVIDE ACCESS TO 911 OR TRANSMIT THE LOCATION OR EXTENSION IF CUSTOMER ATTEMPTS TO ACCESS 911 IN AN EMERGENCY. Examples include voice over Internet protocol, Centrex, and private branch exchange. Additionally, because T1s and VoIP can cease operating during a power outage, Customer should have a basic business or copper line for elevator, alarm, E911 and other critical functions. By signing this Agreement, Customer acknowledges that Customer has read this disclosure. By proceeding with use of Services, Customer assumes all responsibility and risk of harm, loss, or damage in the event that 911 access fails, is not possible, or does not provide the address, correct address, extension or other information to emergency authorities.

18. Confidentiality. Except when this Agreement is required to be filed with a governmental authority, the Parties agree that this Agreement contains proprietary and confidential information and shall not be disclosed publicly to any third party except the such dealer(s) or agent(s) of Company that are negotiating with Customer in order to execute this Agreement.

19. Telephone Numbers. In no event shall Company be liable for (i) any telephone numbers published or distributed by Customer prior to acceptance of Service at all of the locations covered under the Agreement; or (ii) for any directory publishing error.

20. Miscellaneous. (a) **Notices and Electronic Communications.** Any notice pursuant to this Agreement must be in writing and will be deemed properly given if hand delivered, mailed or faxed to Customer at the address populated above or to Company at Windstream, Attn: Correspondence Division, 1720 Galleria Blvd., Charlotte, NC 28270, Windstreambusinesscustomersupport@windstream.com or at such other address provided to the other party. **CUSTOMER AGREES THAT COMPANY MAY SEND ELECTRONIC MESSAGES TO CUSTOMER CONCERNING COMPANY'S SERVICES.** (b) **Applicable Law.** This Agreement is subject to applicable federal law and the laws of the state in which the Services are provided, without regard to that state's conflict of laws principles. If this Agreement covers multiple states, then it is subject to Delaware law, without regard to its conflict of law principles; (c) **Waiver of Jury Trial.** EACH PARTY HERETO HEREBY WAIVES, TO THE FULLEST EXTENT PERMITTED BY APPLICABLE LAW, ANY RIGHT IT MAY HAVE TO A TRIAL BY JURY IN RESPECT TO ANY LITIGATION DIRECTLY OR INDIRECTLY ARISING OUT OF, UNDER OR IN CONNECTION WITH THIS AGREEMENT. (d) **Assignment.** Either party may assign this Agreement to an affiliate or acquirer of all or substantially all of its assets without any advance consent from the other party but Customer shall provide Company with notice and complete all paperwork necessary to effectuate any change in ownership or other account changes. Otherwise, Customer may not assign its rights and obligations under this Agreement without Company's advance written consent; Any attempted assignment in violation of this provision is void; (e) **Third Party Beneficiaries.** No third party shall be deemed a beneficiary of this Agreement; (f) **Waiver.** Either party's failure to enforce any right or remedy available under this Agreement is not a waiver; (g) **Severability.** If any part of this Agreement is held invalid or unenforceable, the remainder of this Agreement shall remain in full force and effect; (h) **Survival.** Sections 14 through 20 survive after this Agreement ends; (i) **Handwritten Changes.** Handwritten changes are not binding on either party; (j) **Use of Products in U.S.** Customer acknowledges that the transfer and use of products, services and technical information outside the United States are subject to U.S. export laws and regulations. Customer shall not use, distribute, transfer, or transmit the products, services or technical information (even if incorporated into other products) except in compliance with U.S. export laws and regulations. At Company's request, Customer shall sign written assurances and other export-related documents as may be required for Company to comply with U.S. export regulations; (k) **Representation on Authority of Parties/Signatories.** Each person signing this Agreement represents and warrants that he or she is duly authorized in accordance with its corporate governance documents and has legal capacity to execute and deliver this Agreement. Each party represents and warrants to the other that the execution and delivery of the Agreement and the performance of such party's obligations hereunder have been duly authorized in accordance with its corporate governance documents and that the Agreement is a valid and legal agreement binding on such party and enforceable in accordance with its terms.

For Dynamic IP Services Only:

Customer represents and warrants that it will immediately notify and post alternative dialing instructions to its end-users if any restrictions or limitations to access emergency 911 services a result from its actions including but not limited to: (a) Extending the origination of outbound calling capabilities of the Dynamic IP service outside of the Company Dynamic IP-serviceable area by means of private circuits, wireless service, public networks, the public Internet or other means; (b) Implementing call routing schemes within its applications, systems or networks which may prevent access to emergency services; or (c) Implementing call routing schemes within its applications, systems or networks which may route outbound emergency 911 calls to Public Service Answering Points (PSAPs) other than the PSAP servicing the calling party end-user location. Customer agrees to indemnify and hold Company harmless from all claims, causes of action, damages and judgments arising from restrictions or limitations to access emergency 911 services as a result of customer's actions or inactions in ensuring that all 911 dialed calls are routed to the proper PSAP using Company's dynamic IP service.

For Managed CPE Firewall Services Only:

Authorization to Perform Testing. Certain laws and regulations prohibit the unauthorized penetration of computer networks and systems. Customer hereby grants Company the authority to access Customer's networks and

Customer Initials

J.F.A.

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computer systems solely for the purpose of providing the Managed CPE Firewall Service. Customer acknowledges that the Managed CPE Firewall Service constitutes permitted access to Customer networks and computer systems. In the event one or more of the IP Addresses Customer gives to Company are associated with computer systems that are owned, managed, and/or hosted by a third party service provider ("Host"), Customer agrees to: (i) notify Company of such Host arrangement prior to the commencement of any Managed CPE Firewall Service; (ii) obtain Host's written consent for Company to provide the Managed CPE Firewall Service on Host's computer systems, which includes acknowledgement of the risks and acceptance of the conditions set forth herein; (iii) provide Company with a copy of such consent, acknowledgement and acceptance; and (iv) facilitate any necessary communications and exchanges of information between Company and Host in connection with the Managed CPE Firewall Service. Customer agrees to indemnify, defend and hold Company and its suppliers harmless from and against any and all claims, losses, liabilities and damages, including reasonable attorney's fees that arise out of Customer's failure to comply with this section. Customer will indemnify and hold Company and its suppliers harmless from any and all third party claims that arise out of the testing and evaluation of the security risks, exposures, and vulnerabilities of the IP Addresses that Customer provides. Customer acknowledges that the Managed CPE Firewall Service entail certain risks including the following possible negative impacts: (i) excessive log file disk space may be consumed due to the excessive number of log messages generated by the Managed CPE Firewall Service; (ii) performance and throughput of networks and associated routers and firewalls may be temporarily degraded; (iii) degradation of bandwidth; and (iv) Customer computer systems may hang or crash resulting in temporary system unavailability and/or loss of data.

With regard to any software components of the Firewall Device, Customer agrees it will not: (i) use or make any copies of the software; (ii) reverse engineer, decompile, or disassemble the software; (iii) sell, resell, transfer, license, sublicense, or distribute the software; or (iv) create, write, or develop any derivative software or other software program that is based on such software. Customer agrees to indemnify, defend and hold Company and its suppliers harmless from and against any and all claims, losses, liabilities and damages, including reasonable attorney's fees, which arise out of Customer's failure to comply with the foregoing.

For Private IP VPN Services only:

Encryption. For the IPSec Private IP-VPN Managed solution, Company shall provision and maintain the IPSec tunneling with standard publicly released and generally available encryption software (i.e., currently 3DES encryption) between Customer's Remote Sites and the Hub Location. Customer shall be responsible for registering for and supplying to Company any non-standard encryption software and for complying with all use obligations and restrictions related to such non-standard encryption software (including without limitation export restrictions).

IN WITNESS WHEREOF, the parties have duly executed and delivered this Agreement as of the Effective Date.

COMPANY *windstream*

By:

Name:

Title:

Richard Holgood
SAM

CUSTOMER

By:

Name:

Title:

Steven L. Sellers
COO

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FRN 2791779



ISDN-PRI Term & Service Agreement

Rev. 7/2014

This ISDN-PRI Term and Service ("Agreement") is by and between EASTON TELECOM SERVICES, L.L.C. with its principal place of business at Summit II, 3046 Brecksville Road, Unit A, Richfield, Ohio 44286 and ECOT (customer).

This agreement is entered into on the date of installation and shall extend through a period of (check one)

(The checking of a box makes this an "Easton Term Plan".)

Term Length (required)

12 Month ☒ 24 Month ☐ 36 Month ☐ Initials _____

For the ISDN/PRI listed below:

NPA/NXX _____

Underlying Network Level 3

Service	QTY	Monthly Recurring Charge (MRC)	Install (NRC)
Loop	2	\$598.00	
Port	2	\$0.00	
Equipment			
TOTALS			

Service	Minute Package	MRC
Local Call Pack*		

* For PRI on the One Communications network only.

Term: The service shall be provided for the term specified above, unless sooner terminated as provided herein. Upon expiration, the term shall be extended automatically on a month-to-month basis, unless and until either party gives the other no less than 30 days' prior written notice of termination or contract extension.

Should the subscriber discontinue the service within the stated committed time period, Easton reserves the right to bill subscriber for the amount of the monthly fees multiplied by the number of months remaining in the term agreement, less any direct and actual out-of-pocket savings, if any, enjoyed and calculable by Easton as a direct result of not providing the service. The subscriber agrees to pay said invoice upon receipt of billing, as liquidated damages for breach of customer's term commitment.

Limitation of Liability:

Upon occasion, during the installation and/or testing phase of placing your orders in service, costs or expenses are incurred by the Customer (e.g., to verify its own equipment or to inspect the functionality of its own equipment.) Easton will only be responsible for costs actually and directly incurred by it (and not by the Customer) or for the Customer's costs if, and only if, Easton has accepted that responsibility in writing prior to the Customer incurring those costs.

Interest/Late Fee Charges upon Unpaid Balances

Easton invoices Customers on a monthly basis. Those invoices are due within 25 days of the Invoice Date. Late fees or interest will be charged by Easton on the unpaid balances of its invoices to Customers beginning with the 26th day after the Invoice Date at the rate of 1.5% per month or 18% per annum until payment is received by Easton.

FRAUDULENT USAGE

Customer is solely responsible for all usage of the Services, fraudulent or otherwise. Claims of fraudulent usage shall not constitute a valid basis for dispute of an invoice. The Parties agree that Customer, and not Company, shall bear all risk of loss arising from fraudulent or unauthorized use of the Services. Company reserves the right, but has no duty, to take any action it deems appropriate to prevent any fraud or abuse in connection with the Services, consistent with applicable federal and state laws and regulations. Under no circumstances shall Company be held liable for any liabilities or damages resulting from or arising out of any action or inaction of Company under this provision.

Customer Understands that:

- Easton will make all arrangements with the underlying carrier to install the above service(s) after appropriate credit requirements are met.
- Customer's ISDN-PRI services will be an Easton billed product as represented herein.
- Customer retains control over their ISDN-PRI and appoints EASTON as their agent in matters regarding the ISDN-PRI service.
- Customer may withdraw from the service at any time with thirty (30) business days prior written notice without further cost or obligation provided customer has not enrolled in an EASTON Term Plan or promotion and all invoices through the date of termination are paid in full.
- Customer will be responsible for Easton's fees based upon costs as presented above. Easton's fees as described above will be payable only after the lines have been installed, and may include a partial month's billing. Fees for service will be based on proposed information and may be altered due to tariff changes or supplier price changes without notice.
- Customer's ISDN-PRI(s) is (are) subject to disconnection if customer fails to pay their Easton invoices within twenty-five (25) days.
- Customer understands they will be responsible for all fees for service up to the time of disconnection of service including but not limited to all late fees, service fees, installation fees, termination charges and/or liquidated damages in the event of early termination of an Easton Term Plan.
- The monthly recurring charge for the ISDN-PRI service will commence immediately after acceptance by our underlying carrier.
- Installation of ISDN-PRI service is contingent upon EASTON's approval of customer's credit.
- EASTON is not responsible for charges incurred by equipment installation, equipment vendors, or any service that was not provided by EASTON for this ISDN-PRI.
- Unless otherwise noted upon expiration of a contract's time period the customer's service shall continue on a month to month basis, unless and until either party gives the other no less than 30 days written notice of termination or contract extension, if the customer's bills from Easton are then current.
- Easton reserves the right to change rates proportionally as Easton's rates from its' suppliers change.

Acceptance

BY SIGNATURE BELOW, CUSTOMER ACKNOWLEDGES HAVING READ THE TERMS ON THE ATTACHED AND AGREES TO BE BOUND BY THEM. IN WITNESS WHEREOF, the parties hereto have executed this Agreement as of the day and year first written below.

ALL RATES ARE SUBJECT TO APPLICABLE TAXES.

Customer Acceptance		Easton Acceptance	
Company Name	ECOT	Easton Telecom Services, L.L.C.	
Signature	<u>Betty A. Pierson</u> <u>4-25-15</u>	Signature	<u>Robert E. Mocas</u>
Printed Name	<u>Betty Pierson</u>	Robert E. Mocas, President	
Title	<u>Deputy Superintendent, Chief of Staff</u>	Date	<u>4-9-15</u>
Date	<u>3/25/15</u>	Distributor	

Exhibit I

FY 2015 E-rate Application Information Request

12/9/2015

Contact Name: Greg Spencer

Applicant Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)

FCC Form 471 Application Number(s): 1009681

Response Due Date: 12/24/2015

Dear Applicant:

The Cost Effectiveness Review (CER) team is in the process of reviewing your Funding Year 2015 FCC Form 471 Applications for E-rate discounts. To complete our review, we need additional information, which is listed below.

I. Issue

In response to the Information Request for FY2015 FCC Form 471 application #1009681, you indicated a consultant was not used however the documentation indicates the school is using a consultant. Please provide a copy of a signed and dated Consultant Agreement(s) or Letter of Agency.

Program procedures require that a consulting agreement or LOA authorizing a consultant to act on behalf of the applicant must be for Funding Year 2015. Failure to provide a consultant agreement, LOA or other proof of authorization for Funding Year 2015 will delay USAC's ability to issue a funding commitment decision letter for an indefinite period of time.

II. Issue

In response to the Information Request for FY2015 FCC Form 471 application #1009681, you did not provide the total number staff/teachers and classrooms/buildings for each entity. Please provide the following information for each entity:

Entity #	Entity Name	Total # of Staff & Teachers	# of Classrooms	# of Buildings
221005	ELECTRONIC CLASSROOM OF TOMORROW (ECOT)			
16064648	ELECTRONIC CLASSROOM OF TOMORROW - REC			
16084834	ECOT TESTING CENTER - DUBLIN			
16084835	ECOT TESTING CENTER - CLEVELAND			

III. Issue

In response to the Information Request for FY2015 FCC Form 471 application #1009681, you indicated FRN 2740682 from Time Warner Cable is a point to point circuit connecting the administrative office (entity #221005) to the data center. The Item 21 attachment for FRN 2742851 also indicates this is a point to point circuit to entity #221005. It appears these funding requests are providing duplicative services. Duplicative services are defined as services that deliver the same functionality to the same population in the same location during the same period of time. If the FRNs are duplicates, then one of the FRNs must be cancelled.

For additional information on duplicative services, see:
<http://www.usac.org/sl/applicants/beforeyoubegin/eligible-services-list.aspx>.

Question

To assist us in the review of your application, we need the following information:

#	Questions	Your Response
1	Are the funding requests mentioned above providing duplicative services?	<u> Yes </u> <u> No </u>
a	If Yes , please send us written authorization to cancel or modify the FRN that is providing duplicative services. In your written reply, please specify which funding requests you wish to cancel or modify to remove the duplicate FRN Line Item(s) listed above.	<input type="checkbox"/> Enclosed
b	If No , Please provide third-party documentation verifying that the requests are not duplicates. Examples of documentation verifying that the applications are not duplicates are bills or signed copies of contracts verifying different services being delivered, applicant's statement in writing that FRNs are for different locations or other detailed information specifying the recipients of service and/or types of services being provided. Additionally, please provide a written explanation as to why these FRNs are not duplicates.	<input type="checkbox"/> Enclosed

Please submit the necessary information within the 15 calendar day deadline of this request. Failure to respond may result in a reduction or denial of your funding request(s).

IV. Issue

Based on the review of your Funding Year 2015 FCC Form 471 application 1009681, the documentation provided for FRN 2840474 indicates the 3 Gbps aggregated circuit is provided by 6 different carriers. The average utilization of the circuit is currently 1.5 Gbps with the additional 1.5 Gbps allocated for growth and peak utilization above the average. The peak utilization is estimated to be an additional 900 Mbps.

Question

To assist us in the review of your application, we need the following information:

1. Please provide the names of the 6 carriers providing the service.
2. The documentation indicates the aggregated circuit has multiple diverse pathways into the

- datacenter which minimizes risk and optimizes performance. Could the bandwidth requirements have been met by a single provider? ____Yes ____No
- If **Yes**, please explain why a single carrier solution was not selected if a single carrier was able to meet the bandwidth requirements.
 - If **No**, please explain the limitations present which prevent a single carrier from providing the service.
3. The average usage of the circuit combined with the peak utilization totals 2.4 Gbps. Is the additional 600 Mbps circuit capacity allocated only to future growth?
____Yes ____No
- If **No**, please explain what the additional 600 Mbps capacity is used for.
4. The documentation indicates that the students in ECOT's environment do all their work via the Internet and all of that traffic passes through ECOT's network. Where are the students located while accessing ECOT's network for the services requested on FRN 2840474?

V. Issue

Based on the review of your Funding Year 2015 FCC Form 471 application 1009681, we have determined that your request includes services to the following entity(ies). However, these entities are not listed in your FCC Form 471 application.

Entity Name
ECOT 535 Scherers Court, Worthington, OH 43085

Entities may be added to the application only if the applicant can demonstrate that the entities were omitted as a result of a Ministerial or Clerical error.

According to FCC Order (FCC 11-60), ministerial and clerical errors are defined as follows: "The applicant can amend its forms to correct clerical and ministerial errors on their FCC Forms 470, FCC Form 471 applications, or associated documentation until an FCDL is issued. Such errors include only the kinds of errors that a typist might make when entering data from one list to another, such as mistyping a number, using the wrong name or phone number, failing to enter an item from the source list onto the application, or making an arithmetic error." Additional correctable errors can be found in the [FCC's Order DA-2354](#).

Questions

To assist us in the review of your application, we need the following information on school or library letterhead signed by a school or library official. If responding via email, please provide the name and title of the school or library official providing the response.

- Were the entities listed above omitted from your FCC Form 471 application due to a Ministerial and Clerical (M&C) error? ____Yes ____No
 - If **No**, no further information is needed.
 - If **Yes**, do you wish to correct the "Discount Calculation" worksheet and add this entity(ies) to your FCC Form 471 application? ____Yes ____No

- a. If **No**, these entities will not be added to the FCC Form 471. Are there costs associated with these entities in your funding request(s)? If so, please provide the dollar amounts for the applicable funding request(s).
- b. If **Yes**, please provide a copy of the source documentation used to prepare your FCC Form 471 application which shows that the entity(ies) to be added are actually receiving service and the dollars associated (if applicable). Examples of supporting documentation are contracts, vendor quotes, vendor bills, invoices, etc.

In addition to the source documentation, your response must include:

1. The Entity Name and associated Entity Number.
Note: If you do not have an entity number, please call the Client Service Bureau at 888-203-8100.
2. Discount information (e.g. total student enrollment and number of students eligible for participation in the National School Lunch Program or NSLP).
3. The Rural/Urban status of the entity.
4. A list of all the FRNs that will be providing services to these entities.
5. State whether the dollars associated with the entity(ies) have already been included in the FRNs or provide the dollars associated with the entity(ies) per FRN.

Be advised that the addition of this entity(ies) may increase or decrease your discount, which could impact your funding.

Please submit the necessary information within the 15 calendar day deadline of this request. Failure to respond may result in a reduction or denial of your funding request(s).

VI. Issue

Based on the documentation that you have provided during the review of your Funding Year 2015 FCC Form 471 1009681, we have determined that FRN 2791240 includes ineligible items. This is a violation of the Program rules and therefore, the funding request amount associated with the ineligible items must be removed.

For further information, see "Cost Allocation Guidelines for Products and Services" located in the Reference Area of the SLD Web site at:

<http://www.usac.org/sl/applicants/beforeyoubegin/eligible-services/cost-allocations.aspx>.

Listed below are the ineligible items and their associated costs:

Ineligible Services	Associated Cost
DIDs	\$62.40 per month

Question

#	Questions	Your Response
1	Please confirm if you agree with the cost allocation.	____ Yes ____ No
2	If Yes , no additional information is required for this issue.	
3	<p>If No, please select one of the options below.</p> <p>Option I: Alternative Cost Allocation If you disagree with the cost allocation outlined above, an alternative cost allocation method or formula which provides the specific cost(s) for the ineligible items is needed. To do so, provide an explanation of the costs associated with these ineligible items and provide documentation, such as bills, to support your answer. All cost-allocations must be based on tangible criteria and reach a realistic result.</p> <p>Option II: Products and Services Eligibility If you disagree with our eligibility determination of your items, please provide third party documentation which demonstrates that the products and services are eligible for E-rate funding.</p> <p>Option III: Splitting the FRN If you disagree with the two options mentioned above, you can remove the funding request amount associated with the ineligible items from the above-referenced FRN. This funding request amount will then be placed on a new FRN (we refer to this process as "splitting an FRN").</p>	<p>Option 1: ____</p> <p>Option 2: ____</p> <p>Option 3: ____</p>

Would you like to split the above-referenced FRN? ____ Yes ____ No

Providing Information for the New FRN

In order to assist us in creating the new FRN that will be used to remove the funding request amount associated with the ineligible items, you must provide us with the information for the new FRN.

You can "split" the FRN by:

- Modifying the current FRN information found in Block 5: Discount Funding Request(s) of your FCC Form 471 by reducing it in order to remove the cost associated with the ineligible items.
- Providing the Block 5: Discount Funding Request(s) information for the original FRN (pre and post-split FRN). The post-split FRN will be a request for the amount of the original FRN with the ineligible cost removed.
- Completing Block 5: Discount Funding Request(s) for the new FRN using the blank Block 5: Discount Funding Request(s) form attached to this letter. The new FRN will be a request for the cost associated with the ineligible items. This FRN will then be denied because it represents the cost associated with the ineligible items.

For additional guidance on filling out your Block 5: Discount Funding Request(s), please refer to the FCC Form 471 filing instructions at <http://www.usac.org/sl/tools/forms/default.aspx>.

Please submit the necessary information within the 15 calendar day deadline of this request. Failure to respond may result in the denial or reduction of your funding request(s).

VII. Issue

We noticed that the Funding Year 2015 FRNs filed for the ELECTRONIC CLASSROOM OF TOMORROW (ECOT) (#221005) may include requests for off-premise services based on your supporting documentation which indicates teachers, students, and other departments who are working from home have telephone extensions that families can call to speak with the teachers directly.

Question

To assist us in the review of your application, we need the following information:

1. Did you include requests for any off-premise services in the following FRNs?

FCC Form 471	FRN	Yes	No
FCC Form 471 application 1009681	FRN 2791240:		
FCC Form 471 application 1009681	FRN 2791779:		
FCC Form 471 application 1009681	FRN 2791128:		
FCC Form 471 application 1009681	FRN 2791160:		

If Yes:

- Please provide the FCC Form 471 Application # and FRN # along with a cost allocation for the off-premise service. Any cost allocation provided for the FRN(s) outlined above should include a reasonable explanation and supporting documentation explaining how you arrived at this cost allocation. If your supporting documentation does not specifically delineate between the costs of the eligible on campus usage and ineligible off campus usage, please provide information setting forth how these costs were allocated. Such a cost allocation must be based on tangible criteria and reach a realistic result.

If No:

- Please provide an explanation as to why your supporting documentation indicates teachers, students, and other departments who are working from home have telephone extensions that families can call to speak with the teachers directly.

Please submit the necessary information within the 15 calendar day deadline of this request. Failure to respond may result in a reduction or denial of your funding request(s).

Response Reminders

Please email or fax the requested information to my attention. If you have any questions or you do not understand what we are requesting, please feel free to contact me.

It is important that we receive all of the information requested **within 15 calendar days** so we can complete our review of your application(s). **Failure to send all of the information requested may result**

in a reduction or denial of funding. If you need additional time to prepare your response, please let me know as soon as possible.

Additionally, please note that you are required to retain all documents related to the application for, receipt and delivery of supported services as well as any other documents that demonstrate compliance with the requirements of the program for at least 10 years after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request.

Thank you for your cooperation and continued support of the Universal Service Program.

Sincerely,

Nancy Rivera
Associate Manager, Cost Effectiveness Review
USAC, Schools and Libraries Division
Phone: 973-581-5055
Fax: 973-599-6520
E-mail: nancy.rivera@sl.universalservice.org

Exhibit J



Ms. Rivera,

As you know, ECOT is a non-traditional, virtual on-line school with 16,000-plus students. Classes are available anytime and anywhere to our students.

The response to your inquiry is at the end of each of the appropriate items and in bold, blue type. Please do not hesitate to contact me with any issues or questions at 614.989.5399 or wgs003@gmail.com.

Included in our response is the following document:

Letter of Authorization

Thank you for all your help,

Greg Spencer
614.989.5399
CRN 16062188

FY 2015 E-rate Application Information Request

12/9/2015

Contact Name: Greg Spencer
Applicant Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
FCC Form 471 Application Number(s): 1009681
Response Due Date: 12/24/2015

Dear Applicant:

The Cost Effectiveness Review (CER) team is in the process of reviewing your Funding Year 2015 FCC Form 471 Applications for E-rate discounts. To complete our review, we need additional information, which is listed below.

I. Issue

In response to the Information Request for FY2015 FCC Form 471 application #1009681, you indicated a consultant was not used however the documentation indicates the school is using a consultant. Please provide a copy of a signed and dated Consultant Agreement(s) or Letter of Agency.

Program procedures require that a consulting agreement or LOA authorizing a consultant to act on behalf of the applicant must be for Funding Year 2015. Failure to provide a consultant agreement, LOA or other proof of authorization for Funding Year 2015 will delay USAC's ability to issue a funding commitment decision letter for an indefinite period of time.

ECOT has contracted with WGS Consulting. Greg Spencer (CRN 16062188) is our consultant of record. Mr. Spencer is an E-Rate consultant and does not participate in any procurement processes, including vendor evaluations, for ECOT. Please see the Letter of Authority.

II. Issue

In response to the Information Request for FY2015 FCC Form 471 application #1009681, you did not provide the total number staff/teachers and classrooms/buildings for each entity. Please provide the following information for each entity:

Entity #	Entity Name	Total # of Staff & Teachers	# of Classrooms	# of Buildings
221005	ELECTRONIC CLASSROOM OF TOMORROW (ECOT)	350 staff	0	1
16064648	ELECTRONIC CLASSROOM OF TOMORROW - REC	4 staff 2 teachers	0	1
16084834	ECOT TESTING CENTER - DUBLIN	2 staff	0	1
16084835	ECOT TESTING CENTER - CLEVELAND	2 staff	0	1

III. Issue

In response to the Information Request for FY2015 FCC Form 471 application #1009681, you indicated FRN 2740682 from Time Warner Cable is a point to point circuit connecting the administrative office (entity #221005) to the data center. The Item 21 attachment for FRN 2742851 also indicates this is a point to point circuit to entity #221005. It appears these funding requests are providing duplicative services. Duplicative services are defined as services that deliver the same functionality to the same population in the same location during the same period of time. If the FRNs are duplicates, then one of the FRNs must be cancelled.

For additional information on duplicative services, see:

<http://www.usac.org/sl/applicants/beforeyoubegin/eligible-services-list.aspx>.

Question

To assist us in the review of your application, we need the following information:

#	Questions	Your Response
1	Are the funding requests mentioned above providing duplicative services?	<u> X </u> Yes <u> </u> No
a	If Yes , please send us written authorization to cancel or modify the FRN that is providing duplicative services. In your written reply, please specify which funding requests you wish to cancel or modify to remove the duplicate FRN Line Item(s) listed above.	<u> X </u> Enclosed We wish to cancel FRN 2742851. It was replaced by FRN 2740682 for Funding Year 2015.
b	If No , Please provide third-party documentation verifying that the requests	<input type="checkbox"/> Enclosed

	<p>are not duplicates. Examples of documentation verifying that the applications are not duplicates are bills or signed copies of contracts verifying different services being delivered, applicant's statement in writing that FRNs are for different locations or other detailed information specifying the recipients of service and/or types of services being provided.</p> <p>Additionally, please provide a written explanation as to why these FRNs are not duplicates.</p>	
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Please submit the necessary information within the 15 calendar day deadline of this request. Failure to respond may result in a reduction or denial of your funding request(s).

IV. Issue

Based on the review of your Funding Year 2015 FCC Form 471 application 1009681, the documentation provided for FRN 2840474 indicates the 3 Gbps aggregated circuit is provided by 6 different carriers. The average utilization of the circuit is currently 1.5 Gbps with the additional 1.5 Gbps allocated for growth and peak utilization above the average. The peak utilization is estimated to be an additional 900 Mbps.

Question

To assist us in the review of your application, we need the following information:

1. Please provide the names of the 6 carriers providing the service.

Easton Telcom is ECOT's single E-Rate certified service provider for FRN 2840474. Easton has access to multiple carriers and utilizes those carriers to provide the most efficient services to their customers. ECOT has contracted for the aggregated circuit, not necessarily any specific carriers. Please note the Easton service is unique as it is aggregated onsite as opposed to being piped in pre-aggregated offsite. This process guarantees a higher quality of service which is required for our educational process to function. There are eight carriers utilized by Easton for our services and they are listed below:

**AT&T
Level 3
TW Telecom (network merging with L3)
Time Warner Cable
XO
Hurricane Electric
Tata
US Signal**

While the carrier diversity of pathways into the data center is beneficial, Easton's multiple carriers also serve us from a quality of service standpoint. As an online school with students in all 88 counties in Ohio, students will be accessing their "classroom" from a number of different Internet providers with diversely back end connected service. Utilizing multiple carriers through Easton for our internet circuit ensures the best quality network path, regardless of the Internet provider our students are connecting through to access their educational content.

2. The documentation indicates the aggregated circuit has multiple diverse pathways into the datacenter which minimizes risk and optimizes performance. Could the bandwidth requirements have been met by a single provider? X Yes No
- If **Yes**, please explain why a single carrier solution was not selected if a single carrier was able to meet the bandwidth requirements.
 - If **No**, please explain the limitations present which prevent a single carrier from providing the service.

Our bandwidth requirements have been met by a single provider, Easton Telcom SPIN 143003988. Easton Telcom utilizes multiple carriers to provide their services.

3. The average usage of the circuit combined with the peak utilization totals 2.4 Gbps. Is the additional 600 Mbps circuit capacity allocated only to future growth?
 Yes X No
- If **No**, please explain what the additional 600 Mbps capacity is used for.

The additional bandwidth is for current growth. ECOT's bandwidth usage continues to grow throughout each school year as the student enrollment grows and the electronic curriculum is utilized. This has been the case every year of ECOT's existence. Usage increases during the school year due to the increased usage of the electronic curriculum. More students accessing the Internet/network/electronic curriculum requires more bandwidth. Students are accessing file types that are larger in nature which require more bandwidth, as well. As an electronic school, this capacity is essential for our students' learning.

4. The documentation indicates that the students in ECOT's environment do all their work via the Internet and all of that traffic passes through ECOT's network. Where are the students located while accessing ECOT's network for the services requested on FRN 2840474?

The students can be located anywhere they have Internet Access. All ECOT educational curriculum is delivered via the Internet.

V. Issue

Based on the review of your Funding Year 2015 FCC Form 471 application 1009681, we have determined that your request includes services to the following entity(ies). However, these entities are not listed in your FCC Form 471 application.

Entity Name
ECOT
535 Scherers Court, Worthington, OH 43085

Entities may be added to the application only if the applicant can demonstrate that the entities were omitted as a result of a Ministerial or Clerical error.

According to FCC Order (FCC 11-60), ministerial and clerical errors are defined as follows: "The applicant can amend its forms to correct clerical and ministerial errors on their FCC Forms 470, FCC Form 471 applications, or associated documentation until an FCDL is issued. Such errors

include only the kinds of errors that a typist might make when entering data from one list to another, such as mistyping a number, using the wrong name or phone number, failing to enter an item from the source list onto the application, or making an arithmetic error.” Additional correctable errors can be found in the FCC’s Order DA-2354.

Questions

To assist us in the review of your application, we need the following information on school or library letterhead signed by a school or library official. If responding via email, please provide the name and title of the school or library official providing the response.

This response has been provided by Mr. Brad C. Scott, Director of IT at ECOT.

As a virtual school, we largely exist online. We have an administrative office and a few testing facilities. When our students "go to school", it is through logging in to the Internet via their computer. Providing the best possible access to the electronic curriculum via Internet circuits is critical to our students’ success.

An aggregated Internet circuit does more than an active/passive failover which may be a point of confusion. Data can be traversing each of the carriers aggregated simultaneously as we are paying for a total of 3GB of bandwidth. The technology in the Easton service operates in a way that allows each packet being sent from a user to come through different providers to make up the total data transferred with the fastest transfer speed utilizing Open Shortest Path First (OSPF) Internet Protocol.

Congestion on a single provider’s network from a large transfer in the route path between a user and a server can cause a timeout and a "page cannot be displayed" error. In a traditional classroom, the teacher can direct the students to something else, but for ECOT, that can cause the classroom to cease to exist at all. The Easton service makes those “traffic” decisions dynamically.

The Scherers location is not an ECOT facility and, therefore, ECOT did not request a Billed Entity Number. In the technology industry, the Scherers location is known as a co-location facility. We are not seeking E-Rate funding for the site itself or the service of hosting our equipment. The Scherers location serves as the virtual front door to ECOT’s classroom. We do not have access to the bandwidth or power necessary to operate a high availability operation at the ECOT administrative office located at 3700 South High Street. It is necessary to contract for this service which is essential for ECOT to provide the classroom experience to its students. The Scherers co-location facility and Easton’s dynamic carrier load balancing service is the best, most cost effective solution for ECOT’s students.

1. Were the entities listed above omitted from your FCC Form 471 application due to a Ministerial and Clerical (M&C) error? ____ Yes __ **X** __ No
 - If **No**, no further information is needed.
 - If **Yes**, do you wish to correct the “Discount Calculation” worksheet and add this

entity(ies) to your FCC Form 471 application? ____ **Yes** ____ **No**

- a. If **No**, these entities will not be added to the FCC Form 471. Are there costs associated with these entities in your funding request(s)? If so, please provide the dollar amounts for the applicable funding request(s).
- b. If **Yes**, please provide a copy of the source documentation used to prepare your FCC Form 471 application which shows that the entity(ties) to be added are actually receiving service and the dollars associated (if applicable). Examples of supporting documentation are contracts, vendor quotes, vendor bills, invoices, etc.

In addition to the source documentation, your response must include:

1. The Entity Name and associated Entity Number.
Note: If you do not have an entity number, please call the Client Service Bureau at 888-203-8100.
2. Discount information (e.g. total student enrollment and number of students eligible for participation in the National School Lunch Program or NSLP).
3. The Rural/Urban status of the entity.
4. A list of all the FRNs that will be providing services to these entities.
5. State whether the dollars associated with the entity(ies) have already been included in the FRNs or provide the dollars associated with the entity(ies) per FRN.

Be advised that the addition of this entity(ies) may increase or decrease your discount, which could impact your funding.

Please submit the necessary information within the 15 calendar day deadline of this request. Failure to respond may result in a reduction or denial of your funding request(s).

VI. Issue

Based on the documentation that you have provided during the review of your Funding Year 2015 FCC Form 471 1009681, we have determined that FRN 2791240 includes ineligible items. This is a violation of the Program rules and therefore, the funding request amount associated with the ineligible items must be removed.

For further information, see "Cost Allocation Guidelines for Products and Services" located in the Reference Area of the SLD Web site at:

<http://www.usac.org/sl/applicants/beforeyoubegin/eligible-services/cost-allocations.aspx>.

Listed below are the ineligible items and their associated costs:

Ineligible Services	Associated Cost
DIDs	\$62.40 per month

Question

#	Questions	Your Response
1	Please confirm if you agree with the cost allocation.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2	If Yes , no additional information is required for this issue.	
3	<p>If No, please select one of the options below.</p> <p>Option I: Alternative Cost Allocation If you disagree with the cost allocation outlined above, an alternative cost allocation method or formula which provides the specific cost(s) for the ineligible items is needed. To do so, provide an explanation of the costs associated with these ineligible items and provide documentation, such as bills, to support your answer. All cost-allocations must be based on tangible criteria and reach a realistic result.</p> <p>Option II: Products and Services Eligibility If you disagree with our eligibility determination of your items, please provide third party documentation which demonstrates that the products and services are eligible for E-rate funding.</p> <p>Option III: Splitting the FRN If you disagree with the two options mentioned above, you can remove the funding request amount associated with the ineligible items from the above-referenced FRN. This funding request amount will then be placed on a new FRN (we refer to this process as "splitting an FRN").</p>	<p>Option 1: _____</p> <p>Option 2: _____</p> <p>Option 3: _____</p>

Would you like to split the above-referenced FRN? ☐ Yes ☒ No

Providing Information for the New FRN

In order to assist us in creating the new FRN that will be used to remove the funding request amount associated with the ineligible items, you must provide us with the information for the new FRN.

You can "split" the FRN by:

- Modifying the current FRN information found in Block 5: Discount Funding Request(s) of your FCC Form 471 by reducing it in order to remove the cost associated with the ineligible items.
- Providing the Block 5: Discount Funding Request(s) information for the original FRN (pre and post-split FRN). The post-split FRN will be a request for the amount of the original FRN with the ineligible cost removed.
- Completing Block 5: Discount Funding Request(s) for the new FRN using the blank Block 5: Discount Funding Request(s) form attached to this letter. The new FRN will be a request for the cost associated with the ineligible items. This FRN will then be denied because it represents the cost associated with the ineligible items.

For additional guidance on filling out your Block 5: Discount Funding Request(s), please refer to the FCC Form 471 filing instructions at <http://www.usac.org/sl/tools/forms/default.aspx>.

Please submit the necessary information within the 15 calendar day deadline of this request. Failure to respond may result in the denial or reduction of your funding request(s).

VII. Issue

We noticed that the Funding Year 2015 FRNs filed for the ELECTRONIC CLASSROOM OF TOMORROW (ECOT) (#221005) may include requests for off-premise services based on your supporting documentation which indicates teachers, students, and other departments who are working from home have telephone extensions that families can call to speak with the teachers directly.

Question

To assist us in the review of your application, we need the following information:

1. Did you include requests for any off-premise services in the following FRNs?

FCC Form 471	FRN	Yes	No
FCC Form 471 application 1009681	FRN 2791240:		X
FCC Form 471 application 1009681	FRN 2791779:		X
FCC Form 471 application 1009681	FRN 2791128:		X
FCC Form 471 application 1009681	FRN 2791160:		X

If Yes:

- Please provide the FCC Form 471 Application # and FRN # along with a cost allocation for the off-premise service. Any cost allocation provided for the FRN(s) outlined above should include a reasonable explanation and supporting documentation explaining how you arrived at this cost allocation. If your supporting documentation does not specifically delineate between the costs of the eligible on campus usage and ineligible off campus usage, please provide information setting forth how these costs were allocated. Such a cost allocation must be based on tangible criteria and reach a realistic result.

If No:

- Please provide an explanation as to why your supporting documentation indicates teachers, students, and other departments who are working from home have telephone extensions that families can call to speak with the teachers directly.

The telephones/extensions referenced in our response are located at ECOT Offices, not in the homes of students or teachers. ECOT has not requested any E-Rate funding for any remote services located in homes of students, teachers, or staff. Windstream and Easton provide telephone services for ECOT facilities only. As an electronic school, ECOT must provide telephone facilities at our location for students and teachers to communicate.

The statement below was our response to the previous inquiry which includes FRNs 2791240, 2791779, 2791128, and 2791160, respectively.

“Because students and teachers are working from home, voice communication is as important a communication medium as other digital communication. Through phones connected into headquarters, each teacher has an extension the ECOT’s families can call to speak to a teacher directly, and other departments interact with the families similarly. The PRI circuits identified also support communication with ECOT’s general information and support call center, counseling department, truancy department, technical helpdesk, principals, testing department, and various personnel supporting the student experience.”

Please submit the necessary information within the 15 calendar day deadline of this request. Failure to respond may result in a reduction or denial of your funding request(s).

Response Reminders

Please email or fax the requested information to my attention. If you have any questions or you do not understand what we are requesting, please feel free to contact me.

It is important that we receive all of the information requested **within 15 calendar days** so we can complete our review of your application(s). **Failure to send all of the information requested may result in a reduction or denial of funding. If you need additional time to prepare your response, please let me know as soon as possible.**

Additionally, please note that you are required to retain all documents related to the application for, receipt and delivery of supported services as well as any other documents that demonstrate compliance with the requirements of the program for at least 10 years after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request.

Thank you for your cooperation and continued support of the Universal Service Program.

Sincerely,

Nancy Rivera
Associate Manager, Cost Effectiveness Review
USAC, Schools and Libraries Division
Phone: 973-581-5055
Fax: 973-599-6520
E-mail: nancy.rivera@sl.universalservice.org

July 1, 2015

To Whom It May Concern:

Subject: Letter of Agency

This Letter of Authority authorizes Greg Spencer, Consultant Registration Number 16062188, to act on behalf of the Electronic Classroom of Tomorrow (BEN 221005) of Columbus, Ohio on all E-Rate matters.

Sincerely,



Brad C. Scott
Director of IT

Cc: Greg Spencer

Exhibit K

FY 2015 E-rate Application Information Request

2/18/2016

Contact Name: Greg Spencer

Applicant Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)

FCC Form 471 Application Number(s): 1009681

Dear Applicant:

The Cost Effectiveness Review (CER) team is in the process of reviewing your Funding Year 2015 FCC Form 471 Applications for E-rate discounts to ensure that they are in compliance with the rules of the Universal Service Program.

I. Issue

We have completed our review of your Funding Year 2015 FCC Form 471 application 1009681 and determined that FRN 2840474 will be denied because the request is for products and services to ineligible entities. Ineligible entities cannot receive E-rate funding. This is a violation of the Program rules and therefore, the funding request will be denied.

For additional information on entity eligibility requirements, see: Before You Begin Eligibility – <http://www.usac.org/sl/applicants/beforeyoubegin/default.aspx>.

Listed below are the ineligible entities or locations:

Entity Name
ECOT at 535 Scherers Court, Worthington, OH 43085

If you do not agree with the review decision

If the entire FRN should not be denied and you have alternative information to support your position, please provide the supporting documentation.

If you fail to respond to this email within 7 days, we will perform the action(s) listed above.

II. Issue

We have completed our review of your Funding Year 2015 FCC Form 471 application 1009681 and have determined that FRN 2840474 includes ineligible items and therefore, will be denied.

Listed below are the ineligible items:

Ineligible Services
Services for a cyber-school entity utilized by students while located off-premise

If you do not agree with the review decision

If you disagree with our determination and you have alternative information, please provide third party documentation to support your position (e.g. vendor bill, contract, service agreement, etc.).

If you fail to respond to this email within 7 days, we will perform the action(s) listed above.

III. Issue

We have completed our review of your Funding Year 2015 FCC Form 471 application 1009681 and determined that FRN 2840474 will be denied because your request has not been justified as cost effective as required by FCC rules.

FRN 2840474 is denied for the following reasons:

This request is for Internet Access at a cost of \$722,124.00 which, for a school that does not have any students located on site, is excessive and not cost effective.

If the FRN(s) should not be denied and you have alternative information to support your position, please provide the supporting documentation. Please keep in mind that your supporting documentation should be the documentation or data used to prepare your FCC Form 471 application.

For additional guidance on determining eligible services, please refer to the USAC website at: <http://www.usac.org/sl/applicants/beforeyoubegin/eligible-services-list.aspx>.

If you fail to respond to this email within 7 days, we will perform the action(s) listed above.

Response Reminders

Please email or fax any information that you wish to provide to my attention. If you have any questions or you do not understand what we are requesting, please feel free to contact me.

Thank you for your cooperation and continued support of the Universal Service Program.

Sincerely,

Nancy Rivera
Associate Case Manager, Cost Effectiveness Review
USAC, Schools and Libraries Division
Phone: 973-581-5055
Fax: 973-599-6520
E-mail: nancy.rivera@sl.universalservice.org

Exhibit L



Ms. Rivera,

The response to your inquiry is at the end of each of the appropriate items and in bold, blue type. Please do not hesitate to contact me with any issues or questions at 614.989.5399 or wgs003@gmail.com.

Thank you for all your help,

Greg Spencer
614.989.5399
CRN 16062188

FY 2015 E-rate Application Information Request

2/18/2016

Contact Name: Greg Spencer
Applicant Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
FCC Form 471 Application Number(s): 1009681

Dear Applicant:

The Cost Effectiveness Review (CER) team is in the process of reviewing your Funding Year 2015 FCC Form 471 Applications for E-rate discounts to ensure that they are in compliance with the rules of the Universal Service Program.

I. Issue

We have completed our review of your Funding Year 2015 FCC Form 471 application 1009681 and determined that FRN 2840474 will be denied because the request is for products and services to ineligible entities. Ineligible entities cannot receive E-rate funding. This is a violation of the Program rules and therefore, the funding request will be denied.

For additional information on entity eligibility requirements, see: Before You Begin Eligibility – <http://www.usac.org/sl/applicants/beforeyoubegin/default.aspx>.

Listed below are the ineligible entities or locations:

Entity Name
ECOT at 535 Scherers Court, Worthington, OH 43085

If you do not agree with the review decision

If the entire FRN should not be denied and you have alternative information to support your position, please provide the supporting documentation.

If you fail to respond to this email within 7 days, we will perform the action(s) listed above.

The 3 Gb service is at the Scherers co-location and acts as the “front door” to our electronic school for more than 16,000 students throughout Ohio. Unlike a traditional brick and mortar school where students file into the building one by one, the “front door” of ECOT must be robust enough to allow 16,000 students through our virtual door simultaneously. Our entire educational curriculum is delivered to the students through our co-location facility. The students use their personal Internet connections to access our “front door” through the 3 Gb service in the co-location housing our data center.

This service is essential to provide the educational curriculum for our students’ consumption.

II. *Issue*

We have completed our review of your Funding Year 2015 FCC Form 471 application 1009681 and have determined that FRN 2840474 includes ineligible items and therefore, will be denied.

Listed below are the ineligible items:

Ineligible Services
Services for a cyber-school entity utilized by students while located off-premise

If you do not agree with the review decision

If you disagree with our determination and you have alternative information, please provide third party documentation to support your position (e.g. vendor bill, contract, service agreement, etc.).

If you fail to respond to this email within 7 days, we will perform the action(s) listed above.

As stated in previous responses, the charter from the state of Ohio under which ECOT must operate does not allow students to receive educational instruction at ECOT’s facilities. As such, the state defines a student’s school site as where they are accessing the school virtually, which in most situations, is from their home.

ECOT is not requesting funding for remote connectivity in households which connects students to the school. ECOT is requesting funding for the circuit ECOT utilizes for core communications that “creates” the school virtually which the students attend.

ECOT spends approximately \$4.2 million on the remote Internet Access at students’ homes needed to “go to school”. Program rules define these expenditures as ineligible for funding and, accordingly, ECOT does not apply for these expenditures. There are two pieces to Internet Access for cyberschools— the virtual school location at Scherers and the students’ remote location for learning. The total cost of Internet Access for this endeavor is approximately \$4.92 million.

III. Issue

We have completed our review of your Funding Year 2015 FCC Form 471 application 1009681 and determined that FRN 2840474 will be denied because your request has not been justified as cost effective as required by FCC rules.

FRN 2840474 is denied for the following reasons:

This request is for Internet Access at a cost of \$722,124.00 which, for a school that does not have any students located on site, is excessive and not cost effective.

If the FRN(s) should not be denied and you have alternative information to support your position, please provide the supporting documentation. Please keep in mind that your supporting documentation should be the documentation or data used to prepare your FCC Form 471 application.

For additional guidance on determining eligible services, please refer to the USAC website at: <http://www.usac.org/sl/applicants/beforeyoubegin/eligible-services-list.aspx>.

If you fail to respond to this email within 7 days, we will perform the action(s) listed above.

As stated in previous responses, the annual student population growth requires a circuit with a large capacity, in this case 3.0 Gb, in order to provide the curriculum to in excess of 16,000 students statewide. The expenditure for this service is more cost effective by leveraging the co-location facility rather than building a data center at ECOT's administrative offices. The connection also provides a significant security level for our students.

Response Reminders

Please email or fax any information that you wish to provide to my attention. If you have any questions or you do not understand what we are requesting, please feel free to contact me.

Thank you for your cooperation and continued support of the Universal Service Program.

Sincerely,

Nancy Rivera
Associate Case Manager, Cost Effectiveness Review
USAC, Schools and Libraries Division
Phone: 973-581-5055
Fax: 973-599-6520
E-mail: nancy.rivera@sl.universalservice.org

Exhibit M



Appeal Deadline 5/23/16

Schools and Libraries Division

FUNDING COMMITMENT DECISION LETTER
(Funding Year 2015: 07/01/2015 - 06/30/2016)

March 24, 2016

Greg Spencer
ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
7512 Tottenham Place
New Albany, OH 43054

486
Form 1141354
See 14147

Re: FCC Form 471 Application Number: 1009681
Billed Entity Number (BEN): 221005
Billed Entity FCC Registration Number (FCC RN): 0014369185
Nickname: FY15 -1

Thank you for your Funding Year 2015 application for Universal Service Support and for any assistance you provided throughout our review. The current status of the funding request(s) in the FCC Form 471 application cited above and featured in the Funding Commitment Report(s) (Report) at the end of this letter is as follows.

- The amount, \$170,804.35 is "Approved."
- The amount, \$622,615.97 is "Denied."
- The amount, \$12,432.00 is "Cancelled."

Please refer to the Report following this letter for specific funding request decisions and explanations. The Universal Service Administrative Company (USAC) is also sending this information to your service provider(s) so preparations can begin for implementing your approved discount(s) after you file FCC Form 486, Receipt of Service Confirmation and Children's Internet Protection Act and Technology Plan Certification Form. A guide that provides a definition for each line of the Report is available in the Guide to USAC Letter Reports in the Reference Area of our website.

NEXT STEPS

- Work with your service provider to determine if you will receive discounted bills or if you will request reimbursement from USAC after paying your bills in full.
- Review Children's Internet Protection Act (CIPA) requirements.
- File FCC Form 486.
- Invoice USAC using the FCC Form 474, Service Provider Invoice (SPI) Form, or FCC Form 472, Billed Entity Applicant Reimbursement (BEAR) Form, as products and services are being delivered and billed.

TO APPEAL THIS DECISION:

If you wish to appeal a decision in this letter to USAC, your appeal must be received by USAC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and email address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the USAC decision letter (e.g., FCDL) and the decision you are appealing:
 - Appellant name,
 - Applicant name and service provider name, if different from appellant,
 - Applicant BEN and Service Provider Identification Number (SPIN),
 - FCC Form 471 Application Number 1009681 and the Funding Request Number (FRN) or Numbers as assigned by USAC,
 - "Funding Commitment Decision Letter for Funding Year 2015," AND

Schools and Libraries Division - Correspondence Unit
30 Lanidex Plaza West, PO Box 685, Parsippany, NJ 07054-0685
Visit us online at: www.usac.org/sl

2372900

- The exact text or the decision that you are appealing.
- 3. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence and documentation.
- 4. If you are the applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are the service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.
- 5. Provide an authorized signature on your letter of appeal.

We strongly recommend that you use one of the electronic filing options. To submit your appeal to USAC by email, email your appeal to appeals@sl.universalservice.org or submit your appeal electronically by using the "Submit a Question" feature on the USAC website. USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to USAC by fax, fax your appeal to (973) 599-6542.

To submit your appeal to USAC on paper, send your appeal to:

Letter of Appeal
 Schools and Libraries Division - Correspondence Unit
 30 Lanidex Plaza West
 PO Box 685
 Parsippany, NJ 07054-0685

For more information on submitting an appeal to USAC, please see "Appeals" in the Schools and Libraries section of the USAC website.

OBLIGATION TO PAY NON-DISCOUNT PORTION

Applicants are required to pay the non-discount portion of the cost of the products and/or services to their service provider(s). Service providers are required to bill applicants for the non-discount portion. The FCC stated that requiring applicants to pay their share ensures efficiency and accountability in the program. If USAC is being billed via the FCC Form 474, the service provider must bill the applicant at the same time it bills USAC. If USAC is being billed via the FCC Form 472, the applicant pays the service provider in full (the non-discount plus discount portion) and then seeks reimbursement from USAC. If you are using a trade-in as part of your non-discount portion, please refer to Disposal or Trade-in of Equipment posted in the Reference Area of our website for more information.

NOTICE ON RULES AND FUNDS AVAILABILITY

Applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with all such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds.

Schools and Libraries Division
 Universal Service Administrative Company

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FUNDING COMMITMENT REPORT
Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2740682
Funding Status: Funded
Service Type: Internet Access
FCC Form 470 Application Number: 115640001150426
SPIN: 143030626
Service Provider Name: Time Warner Cable Information Services (Ohio), LLC
Contract Number: 00003522
Billing Account Number: N/A
Service Start Date: 07/01/2015
Service End Date: N/A
Contract Award Date: 03/25/2015
Contract Expiration Date: 06/30/2017
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$36,432.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$36,432.00
Discount Percentage Approved by the USAC: 80%
Funding Commitment Decision: \$29,145.60 - ERN approved as submitted

FCDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

Canceled

FUNDING COMMITMENT REPORT
Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2742851
Funding Status: Not Funded
Service Type: Internet Access
FCC Form 470 Application Number: 115640001150426
SPIN: 143030626
Service Provider Name: Time Warner Cable Information Services (Ohio), LLC
Contract Number: 00003522
Billing Account Number: N/A
Service Start Date: 07/01/2015
Service End Date: N/A
Contract Award Date: 03/03/2014
Contract Expiration Date: 06/30/2016
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$15,540.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$15,540.00
Discount Percentage Approved by the USAC: 80%
Funding Commitment Decision: \$0.00 - Applicant request
Funding Commitment Decision Explanation: FRN canceled in consultation with the applicant.

FCDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

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FUNDING COMMITMENT REPORT
Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2745196
Funding Status: Funded
Service Type: Internet Access
FCC Form 470 Application Number: 115640001150426
SPIN: 143030626
Service Provider Name: Time Warner Cable Information Services (Ohio), LLC
Contract Number: 00003522
Billing Account Number: N/A
Service Start Date: 07/01/2015
Service End Date: N/A
Contract Award Date: 03/03/2014
Contract Expiration Date: 06/30/2016
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$8,039.64
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$8,039.64
Discount Percentage Approved by the USAC: 80%
Funding Commitment Decision: \$6,431.71 - FRN approved as submitted

FCDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

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FUNDING COMMITMENT REPORT

Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2745223
Funding Status: Funded
Service Type: Internet Access
FCC Form 470 Application Number: 115640001150426
SPIN: 143030626
Service Provider Name: Time Warner Cable Information Services (Ohio), LLC
Contract Number: 00003522
Billing Account Number: N/A
Service Start Date: 07/01/2015
Service End Date: N/A
Contract Award Date: 03/03/2014
Contract Expiration Date: 06/30/2016
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$26,724.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$26,724.00
Discount Percentage Approved by the USAC: 80%
Funding Commitment Decision: \$21,379.20 - FRN approved as submitted

FCDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

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FUNDING COMMITMENT REPORT
Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015



Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2783637
Funding Status: Funded
Service Type: Voice Services
FCC Form 470 Application Number: 146500001272220
SPIN: 143001688
Service Provider Name: The Ohio Bell Telephone Company
Contract Number: MTM
Billing Account Number: 614 R02-3000
Service Start Date: 07/01/2015
Service End Date: 06/30/2016
Contract Award Date: N/A
Contract Expiration Date: N/A
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$5,040.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$5,040.00
Discount Percentage Approved by the USAC: 60%
Funding Commitment Decision: \$3,024.00 - FRN approved as submitted

FCDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

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FUNDING COMMITMENT REPORT
Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2791128
Funding Status: Funded
Service Type: Voice Services
FCC Form 470 Application Number: 146500001272220
SPIN: 143003988
Service Provider Name: Easton Telecom Services, LLC
Contract Number: MTM
Billing Account Number: 20061 16001
Service Start Date: 07/01/2015
Service End Date: 06/30/2016
Contract Award Date: 04/16/2015
Contract Expiration Date: N/A
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$108,000.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$108,000.00
Discount Percentage Approved by the USAC: 60%
Funding Commitment Decision: \$64,800.00 - FRN approved as submitted

FCDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

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FUNDING COMMITMENT REPORT
Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2791160
Funding Status: Funded
Service Type: Voice Services
FCC Form 470 Application Number: 146500001272220
SPIN: 143000677
Service Provider Name: Verizon Wireless (Cellco Partnership)
Contract Number: MTM
Billing Account Number: 981753015-00001
Service Start Date: 07/01/2015
Service End Date: 06/30/2016
Contract Award Date: N/A
Contract Expiration Date: N/A
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$20,624.64
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$20,624.64
Discount Percentage Approved by the USAC: 60%
Funding Commitment Decision: \$12,374.78 - ERN approved as submitted

FCDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

Denial

FUNDING COMMITMENT REPORT
Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2791199
Funding Status: Not Funded
Service Type: Internet Access
FCC Form 470 Application Number: 146500001272220
SPIN: 143000677
Service Provider Name: Verizon Wireless (Cellco Partnership)
Contract Number: MTM
Billing Account Number: N/A
Service Start Date: 07/01/2015
Service End Date: 06/30/2016
Contract Award Date: N/A
Contract Expiration Date: N/A
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$56,145.96
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$56,145.96
Discount Percentage Approved by the USAC: 80%
Funding Commitment Decision: \$0.00 - Ineligible Services/Products
Funding Commitment Decision Explanation: DR1: Thirty percent or more of this FRN includes a request for off-premise usage, which is an ineligible service based on Program rules. <><><><><> DR2: Per the FCC Order 14-99, individual data plans and air cards are ineligible unless applicants can demonstrate either that installing a wireless local area network is not physically possible or that individual data plans are the most cost-effective option. You have not demonstrated that either of the two exceptions applies to services requested in FRN 2791199. Therefore, FRN is denied since services requested are ineligible.

ECDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

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FUNDING COMMITMENT REPORT
Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2791240
Funding Status: Funded
Service Type: Voice Services
FCC Form 470 Application Number: 146500001272220
SPIN: 143030766
Service Provider Name: Windstream Communications, LLC
Contract Number: MTM
Billing Account Number: 113944
Service Start Date: 07/01/2015
Service End Date: 06/30/2016
Contract Award Date: N/A
Contract Expiration Date: N/A
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$11,105.76
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$11,105.76
Discount Percentage Approved by the USAC: 60%
Funding Commitment Decision: \$6,663.46 - FRN approved; modified by SLD
Funding Commitment Decision Explanation: The amount of the funding request was
changed from \$987.88 per month to \$925.48 per month to remove: \$62.40/month for
ineligible DIDs.

FCDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

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FUNDING COMMITMENT REPORT
Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2791779
Funding Status: Funded
Service Type: Voice Services
FCC Form 470 Application Number: 146500001272220
SPIN: 143003988
Service Provider Name: Easton Telecom Services, LLC
Contract Number: N/A
Billing Account Number: 2010 214000
Service Start Date: 07/01/2015
Service End Date: N/A
Contract Award Date: 03/25/2015
Contract Expiration Date: 06/30/2016
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$44,976.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$44,976.00
Discount Percentage Approved by the USAC: 60%
Funding Commitment Decision: \$26,985.60 - FRN approved as submitted

FCDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

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Dent

FUNDING COMMITMENT REPORT
Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2840474
Funding Status: Not Funded
Service Type: Internet Access
FCC Form 470 Application Number: 146500001272220
SPIN: 143003988
Service Provider Name: Easton Telecom Services, LLC
Contract Number: N/A
Billing Account Number: 2010 214000
Service Start Date: 07/01/2015
Service End Date: N/A
Contract Award Date: 03/25/2015
Contract Expiration Date: 06/30/2016
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$722,124.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$722,124.00
Discount Percentage Approved by the USAC: 80%
Funding Commitment Decision: \$0.00 - Cost Effectiveness
Funding Commitment Decision Explanation: DR1: The documentation provided did not sufficiently demonstrate the eligibility for discounts for the following item(s) according to Program rules: ECOT entity located at 535 Scherers Court, Worthington, OH 43085. <><><><><> DR2: Thirty percent or more of this FRN includes a request for services at a cyber-school entity utilized by students while located off-premise, which is an ineligible use based on Program rules. <><><><><> DR3: This funding request is denied as a result of a Cost Effectiveness Review, which has determined that your request for Internet Access has not been justified as being cost effective as required by FCC Rules. This request is for Internet Access at a cost of \$722,124.00 which, for a school that does not have any students located on site, is excessive and not cost effective.

FCDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

Exhibit N

Before the
UNIVERSAL SERVICE ADMINISTRATIVE COMPANY
Washington D.C. 07054

In the Matter of)	
)	
Request for Appeal of)	
)	
Decision of the)	
Universal Service Administrative Company)	File No. _____
)	
By)	
)	
Applicant/Appellant:)	
Electronic Classroom of Tomorrow ("ECOT"))	

Service Providers:

Easton Telecom Services, Inc. #143003988 &
Verizon Wireless (Cellco Partnership) #143000677

Billed Entity #221005

471 Application # 1009681

FRNs # 2791199, # 2840474

Appeal of Funding Commitment Decision Letter 2015 stating:

The amount, \$622,615.97 is 'Denied.'

LETTER OF APPEAL

Pursuant to Section 54.719(a) of the Rules of the Federal Communication Commission ("FCC" or "Commission"), Electronic Classroom of Tomorrow ("ECOT"), respectfully requests review of the March 24, 2016 Funding Commitment Decision Letter ("FCDL")¹ of the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC") that denied funding for FCC Form 470 #146500001272220² and associated Form 471 #1009681³ and Funding Request Numbers ("FRN") 2791199 and 2840474 for Funding Year 2015

¹ Funding Commitment Decision Letter for Funding Year 2015 ("FCDL"), March 24, 2016 attached hereto as Exhibit A.

² FCC Form 470 #146500001272220 attached hereto as Exhibit B.

³ Form 471 #1009681 attached hereto as Exhibit C.

(07/01/2015 – 06/30/2016). In total, USAC denied \$622,615.97 in requested funds for wired and wireless Internet access.⁴ As will be shown below, the SLD improperly denied the funding.

Background

ECOT is a non-traditional, virtual on-line school educating over 16,000 K-12 students in the state of Ohio. Since 2000, ECOT has provided students in Ohio with tuition-free, fully accredited online public school education. Pursuant to Ohio law, ECOT is a K-12 school.

Specifically, ECOT is a “community school” pursuant to Section 3314 of the Ohio Revised Code which provides in pertinent part:

“A community school created under this chapter is a public school, independent of any school district, and is part of the state’s program of education. A community school may sue and be sued, acquire facilities as needed, contract for any services necessary for the operation of the school, and enter into contracts with a sponsor pursuant to this chapter. The governing authority of a community school may carry out any act and ensure the performance of any function that is in compliance with the Ohio Constitution, this chapter, other statutes applicable to community schools, and the contract entered into under this chapter establishing the school.”⁵

Under Ohio law, “community schools” are considered school districts for purposes of state and federal funding:

A community school shall be considered a school district and its governing authority shall be considered a board of education for the purpose of applying to any state or federal agency for grants that a school district may receive under federal or state law or any appropriations act of the general assembly. The governing authority of a community school may apply to any private entity for additional funds.⁶

ECOT is chartered as a specific type of community school identified as an “Internet- or computer-based community school,” which Ohio Code defines as:

⁴ Prior correspondence with USAC related to these appeals is attached hereto as Exhibit D.

⁵ O.R.C. § 3314.01.

⁶ O.R.C. § 3314.082.

[A] community school established under this chapter in which the enrolled students work primarily from their residences on assignments in nonclassroom-based learning opportunities provided via an internet- or other computer-based instructional method that does not rely on regular classroom instruction or via comprehensive instructional methods that include internet-based, other computer-based, and noncomputer-based learning opportunities [....]⁷

ECOT was the first online charter school in the United States to graduate students. As in traditional public schools, ECOT students are expected to complete schoolwork for 25 hours per week during the school year. However, ECOT is able to provide its students flexibility by offering online attendance at a time that works for their schedule. All students are required to take state tests, as required by law, and pass the Ohio Graduation Test to receive a high school diploma. The school offers a unique educational experience to students that may not otherwise be able to attend a traditional public school, including students facing medical issues.

ECOT students perform schoolwork on their own computers or using computers supplied by ECOT at no cost to the student. ECOT transmits lessons online via a high-speed, secure Intranet connection to the ECOT server. In addition to teaching lessons online, ECOT provides testing centers for students to complete state-required achievement and diagnostic assessments. The testing sites are temporary and located across the state, as Ohio law requires Internet- and computer-based community schools, like ECOT, to provide students with testing sites located within a fifty-mile radius of a student's residence.⁸

Discussion

On March 24, 2016, USAC sent ECOT its FCDL for Funding Year 2015 which denied funding for two separate funding requests: (1) FRN 2840474 which requested funding for \$722,124.00 worth of Internet access services provided through Easton Telecom; and (2) FRN

⁷ O.R.C. § 3314.02(A)(7).

⁸ O.R.C. § 3314.25.

2791199 which requested funding for \$56,145.96 worth of individual data plans and air cards through Verizon Wireless. The following summarizes the bases for the denials and ECOT's responses to the denials.

FRN 2840474 - INTERNET ACCESS

The March 24th FCDL denied funding for \$722,124.00 worth of Internet access services provided by Easton Telecom for the following reasons:

DR1: The documentation provided did not sufficiently demonstrate the eligibility for discounts for the following item(s) according to Program rules: ECOT entity located at 535 Scherers Court, Worthington, OH 43085.

DR2: Thirty percent or more of this FRN includes a request for services at a cyber-school entity utilized by students while located off-premise, which is an ineligible use based on Program rules.

DR3: This funding request is denied as a result of a Cost Effectiveness Review, which has determined that your request for Internet Access has not been justified as being cost effective as required by FCC Rules. This request is for Internet Access at a cost of \$722,124.00 which, for a school that does not have any students located on site, is excessive and not cost effective.⁹

As will be shown below, USAC improperly denied funding for the requested Internet access services which are utilized by ECOT for educational purposes in a manner consistent with the Commission's rules.

DR1: Eligibility of the Scherers Data Center

It appears that USAC bases its allegation that ECOT did not sufficiently demonstrate the eligibility of the Scherers Court facility ("Scherers Data Center") for discounts on Section 54.501 of the Commission's rules which defines eligible recipients as "schools meeting the statutory definition of 'elementary school' or 'secondary school.'"¹⁰ USAC appears to have determined

⁹ See FCDL, Exhibit A at 13.

¹⁰ 47 C.F.R. 54.501.

that since ECOT could not establish the Scherers facility as a school facility and thus, eligible entity, the funding for Internet access services through the Scherers facility was not eligible.

The flaw in this reasoning is that the Scherers data center is not part of ECOT. The data center is a facility utilized by the service provider to provide Internet access service. The data center is neither a school, administrative office nor a non-instructional facility associated with a school. Rather, Easton Telecom, the service provider providing Internet access for ECOT, utilizes the Scherers Data Center to provide 3Gbps/3Gbps Internet access service for ECOT's administrative building and the ECOT distance learning platform. Accordingly, ECOT should not need to demonstrate the eligibility of the Scherers Data Center for funding. The data center is not an ECOT entity for which service is obtained; it is merely part of the facilities used by the service provider to provide eligible services to eligible entities.

DR2: Off-Premise Use of the Service

The second reason that USAC provided for denying the funding was that thirty percent or more of the funding was being used by students located off-campus. The Communications Act provides that services funded through the E-rate program must be provided for an “educational purpose” to “eligible recipients,” which are defined, in part, as schools.¹¹ Section 54.500 of the Commission's rule clarifies that activities that are “integral, immediate, and proximate to the education of students [...] qualify as ‘educational purpose,’” moreover, “[a]ctivities that occur on library or school property are presumed to be integral, immediate, and proximate to the education of students [...].”¹² Accordingly, there is a presumption that the use of services for activities on a school campus is considered to be used for an educational purpose in fulfillment of the mandate in the Communications Act.

¹¹ 47 USC §254(h)(1)(B); 54 CFR 54.501(a).

¹² 54 CFR §54.500.

USAC concludes in the FCDL that the mere fact that students access ECOT's service from their homes means that ECOT is requesting funding for off-campus Internet access. USAC's conclusion, however, is incorrect and mischaracterizes ECOT's services. ECOT seeks funding for Internet access to its administrative buildings, permanent testing facilities and to support the school environment that it provides in the cloud. Each of these locations, physical or virtual, are part of ECOT's digital learning campus. In certain of these locations, school administrative staff supports the school, and in other locations students arrive to take tests online that are proctored by an ECOT teacher. In addition, the Internet access is used to run the virtual classroom platform. The Internet access does not, however, provide Internet access to ECOT's student population. Students must utilize their own Internet access service in order to access ECOT's virtual classroom. So, the student's off-campus home use is not relevant in the analysis of these funds.

It is true that, unlike a traditional school, ECOT does not have a physical campus within which students attend classes. ECOT's classroom is provided virtually. The non-existence of a physical campus, however, does not translate into ECOT's Internet access being utilized off-premise. The "campus" for a virtual classroom is the virtual space in which the student "attends" the class. In virtual classroom environments, the student attends class in the cloud. ECOT's Internet access funding, in part, supports that classroom in the cloud. It is a mischaracterization to state that the classroom in the cloud is off-campus, since the cloud is the campus.

Since 100% of the requested funding for Internet access goes to serve school facilities and the virtual classroom, which the State of Ohio treats as K-12 schools,¹³ the thirty percent rule referenced in the FCDL does not apply. Section 54.504(b) of the Commission's rules requires a request to be denied if thirty percent or more of the request is for discounts to support ineligible

¹³ See p.2 *infra*.

services.¹⁴ Here, all of the services are eligible. Accordingly, the thirty percent rule does not provide a basis for denial.

DR3: ECOT's Proposed Internet Access Service is Cost-Effective

The third reason for denial of Internet access funding was that the amount requested was not cost effective. USAC denied ECOT's Internet access funding based on the finding that a request for Internet access at a cost of \$722,124.00 for a school that does not have any students located on site is excessive and not cost effective. Section 54.511(a) of the Commission's rules requires that entities select the most cost-effective service offering.¹⁵

USAC's conclusion that a virtual school should not need significant bandwidth simply because no students are physically present on its campus ignores the reality that a virtual school typically has greater bandwidth needs than a traditional school. The 3Gbs/3Gbps connection requested by ECOT is necessary to provide students with continuous access to ECOT's virtual classroom environment, support ECOT's administrative offices and serve permanent testing facilities.

In a 24-hour period, ECOT transfers approximately 5-6 TB of total data in order to deliver its virtual classroom materials to students located across the state of Ohio. Increasingly, much of the content accessed by students has been HD video classroom content which utilizes between five (5) to eight (8) Mbps. If only 600 of ECOTs over 16,000 currently enrolled students needed simultaneous access to that HD content, ECOT would exceed its allocated 3Gbps connection. In order to provide the quality of services required of an online community school in the state of Ohio, ECOT needs to purchase sufficient bandwidth to serve its 16,000 students. \$722,124.00 represents a reasonable amount for a 3Gbps/3Gbps Internet access service

¹⁴ 47 CFR 54.504(b).

¹⁵ 47 CFR 54.511(a).

that must sustain continuous traffic from students accessing the virtual classroom from across the state. Accordingly, USAC should not have found that the requested amount was not cost effective.

FRN 2791199 – INDIVIDUAL DATA PLANS

In addition to denying funding for Internet Access, the FCDL also denied ECOT's funding request for \$56,145.96 worth of funding for individual data cards and wireless plans used at ECOT's temporary testing centers. USAC provided the following two reasons for the denial:

DR1: Thirty percent or more of this FRN includes a request for off-premise usage, which is an ineligible service based on Program rules.

DR2: Per the FCC Order 14-99, individual data plans and air cards are ineligible unless applicants can demonstrate either that installing a wireless local area network is not physically possible or that individual data plans are the most cost-effective option. You have not demonstrated that either of the two exceptions applies to services requested in FRN 2791199. Therefore, FRN is denied since services requested are ineligible.¹⁶

As will be shown below, USAC improperly denied funding for the requested wireless data cards which are utilized by ECOT for educational purposes in a manner consistent with the Commission's rules.

DR1: ECOTs Temporary Testing Centers are “On Premise” Pop-Up Facilities, Eligible for Funding

The first basis provided by USAC for denial of FRN 2791199 was that thirty percent or more of the FRN included a request for off-premise usage of a wireless device, which is ineligible based on program rules. Presumably, the FCDL was referencing the requirement in the 2015 Eligible Services List (“2015 ESL”) stating that “off-campus use [of data plans and air

¹⁶ See FCDL, Exhibit A at 10.

cards], even if used for an educational purpose, is ineligible for support and must be cost allocated out of any funding request.”¹⁷

The FCDL, however, was wrong to characterize the temporary testing facilities as “off-campus.” As explained above, Ohio law mandates that online community schools must provide their students with access to testing facilities within fifty miles of the student’s home to fulfill state testing requirements. In order to abide by this requirement, ECOT arranges with facilities across the state of Ohio to provide for these “pop-up” testing sites, where ECOT teachers administer online tests and monitor test takers. The sites provide an “on premise” test-taking experience for home study students. However, due to their temporary nature, traditional fixed broadband would not be a cost effective method of obtaining Internet access.

In the E-rate Modernization Order the Commission specifically discussed use of wireless data cards by entities similar to ECOT. There, the Commission recognized that there “may also be some schools or libraries where installation of a wireless network is possible but would be more costly than using individual data plans because the school or library location serves a very small number of students or patrons.”¹⁸ By way of example, the Commission pointed to comments filed in the proceeding regarding the use of air cards for off-campus library outreach, bookmobile services, and “pop-up” locations.¹⁹ ECOT’s “pop-up” testing facilities fall within the same type of facilities addressed by the Commission, where traditional broadband would be more costly than individual data plans. These “on premise” pop-up testing facilities are, therefore, eligible for Internet access service.

¹⁷ In the Matter of Schools and Libraries Universal Service Support Mechanism, A National Broadband Plan for our Future, Modernizing the E-rate Program for Schools and Libraries, 29 FCC Rcd 13404, 13418 (2015).

¹⁸ *E-rate Modernization Order*, 29 FCC Rcd 8933 at ¶153 (2014).

¹⁹ *Id.* at fn. 362.

Since 100% of the requested funding for the temporary facilities is eligible, the thirty percent rule reference in the FCDL does not apply. Section 54.504(b) of the Commission's rules requires a request to be denied if thirty percent or more of the request is for discounts to support ineligible services.²⁰ Since service to the temporary facilities is eligible, the thirty percent rule does not provide a basis for denial.

DR2: Individual Data Plans are the Most Cost Effective Option for Internet Access to ECOT's Temporary Testing Facilities

The second basis for the FCDL's denial of funding for wireless data plans was that ECOT had not shown that the wireless data plans were the most cost effective option for obtaining service. The denial was presumably based on the directives from the First E-rate Modernization Orders. In the First E-rate Modernization Order, the Commission found that data plans and air cards for mobile devices would continue to be eligible for E-rate support, but that a school or library seeking support for the service must show that individual data plans are the most cost-effective option for providing broadband access.²¹

USAC's denial of the funding for data plans and air cards was improper based on the clarifications provided by the Commission in the Second E-rate Modernization Report and Order which accounts for facilities like ECOT's temporary testing centers. In the Second E-rate Modernization Report and Order, the Commission clarified that applicants seeking funding for data plans or air cards for mobile devices should compare the cost of all components necessary to delivery connectivity to the end user, including the cost to connect traditional Internet access to a school.²² Moreover, in the Order the Commission stated that "the impracticality or unusually

²⁰ 47 CFR 54.504(b).

²¹ *E-rate Modernization Order*, 29 FCC Rcd 8933 at ¶151 (2014).

²² *In the Matter of Modernizing the E-rate Program for Schools and Libraries, Connect America Fund*, Second Report and Order and Order on Reconsideration, 29 FCC Rcd 15538, 15601 at ¶158 (2014) ("*Second E-Rate Modernization Order*").

high cost of purchasing a fixed broadband connection to the location should be a factor in the applicant's cost-effectiveness analysis" and cited to examples of bookmobiles or very small school facilities as places where individual data plans may be more cost effective.²³

For ECOT's temporary, pop-up testing facilities, individual data cards present the most cost-effective option for providing Internet access. ECOT utilizes over 480 pop-up sites as temporary testing facilities in order to fulfill its mandate under Ohio law to offer testing facilities within 50 miles of its 16,000+ students. In a given year, ECOT typically will use around 180 sites. Attached is a list of the sites utilized by ECOT for testing.²⁴ Since these sites are only utilized for testing purposes, when needed, sites may be utilized for as few as three days in a given year. In other instances some sites could be used as many as seventy days a year, but not contiguously.

Assuming the owners of these sites would even be willing to allow ECOT to run fiber connections and bring wired Internet access to each facility, a conservative estimate of costs for traditional wired Internet access would be \$600/month or \$7,200 per year/per facility.²⁵ For 180 facilities a year, the total cost for wired Internet access would come to approximately \$1,286,000 – well over the amount requested for individual data cards and wireless access plans. When ECOT ran a cost comparison between fixed broadband and individual data plans, ECOT easily determined that individual data plans would be the most cost-effective option. Based on this cost information, ECOT has selected the most cost-effective option.

Conclusion

It was error for USAC to deny funding for FRNs 2840474 and 2791199 because: (1) the Scherers data center was mischaracterized as an ECOT entity, so the thirty percent rule does not

²³ *Id.*

²⁴ See ECOT Testing Facility Site List, attached hereto as Exhibit E.

²⁵ See Declaration of Brad C. Scott, attached hereto as Exhibit F.

apply; (2) Internet access for the fixed ECOT entities is not being used off-premises; (3) Internet access for the fixed ECOT facilities is the most cost effective option; (4) the use of the individual data plans at ECOT's on premise pop-up testing facilities is eligible for funding, so the thirty percent rule should not have been applied; and (5) individual data plans are the most cost effective method of receiving Internet access for ECOT's temporary testing facilities.

Therefore, ECOT respectfully requests that USAC grant this Letter of Appeal and approve funding for FRNs 2840474 and 2791199.

Respectfully submitted,

ELECTRONIC CLASSROOM OF TOMORROW

By: 

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Its Attorneys

May 23, 2016

Exhibit A



Appeal Deadline 5/23/16

Schools and Libraries Division

FUNDING COMMITMENT DECISION LETTER
(Funding Year 2015: 07/01/2015 - 06/30/2016)

March 24, 2016

Greg Spencer
ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
7512 Tottenham Place
New Albany, OH 43054

486
Form 1141354
See 14147

Re: FCC Form 471 Application Number: 1009681
Billed Entity Number (BEN): 221005
Billed Entity FCC Registration Number (FCC RN): 0014369185
Nickname: FY15 -1

Thank you for your Funding Year 2015 application for Universal Service Support and for any assistance you provided throughout our review. The current status of the funding request(s) in the FCC Form 471 application cited above and featured in the Funding Commitment Report(s) (Report) at the end of this letter is as follows.

- The amount, \$170,804.35 is "Approved."
- The amount, \$622,615.97 is "Denied."
- The amount, \$12,432.00 is "Cancelled."

Please refer to the Report following this letter for specific funding request decisions and explanations. The Universal Service Administrative Company (USAC) is also sending this information to your service provider(s) so preparations can begin for implementing your approved discount(s) after you file FCC Form 486, Receipt of Service Confirmation and Children's Internet Protection Act and Technology Plan Certification Form. A guide that provides a definition for each line of the Report is available in the Guide to USAC Letter Reports in the Reference Area of our website.

NEXT STEPS

- Work with your service provider to determine if you will receive discounted bills or if you will request reimbursement from USAC after paying your bills in full.
- Review Children's Internet Protection Act (CIPA) requirements.
- File FCC Form 486.
- Invoice USAC using the FCC Form 474, Service Provider Invoice (SPI) Form, or FCC Form 472, Billed Entity Applicant Reimbursement (BEAR) Form, as products and services are being delivered and billed.

TO APPEAL THIS DECISION:

If you wish to appeal a decision in this letter to USAC, your appeal must be received by USAC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and email address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the USAC decision letter (e.g., FCDL) and the decision you are appealing:
 - Appellant name,
 - Applicant name and service provider name, if different from appellant,
 - Applicant BEN and Service Provider Identification Number (SPIN),
 - FCC Form 471 Application Number 1009681 and the Funding Request Number (FRN) or Numbers as assigned by USAC,
 - "Funding Commitment Decision Letter for Funding Year 2015," AND

Schools and Libraries Division - Correspondence Unit
30 Lanidex Plaza West, PO Box 685, Parsippany, NJ 07054-0685
Visit us online at: www.usac.org/sl

2372900

- The exact text or the decision that you are appealing.
- 3. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence and documentation.
- 4. If you are the applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are the service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.
- 5. Provide an authorized signature on your letter of appeal.

We strongly recommend that you use one of the electronic filing options. To submit your appeal to USAC by email, email your appeal to appeals@sl.universalservice.org or submit your appeal electronically by using the "Submit a Question" feature on the USAC website. USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to USAC by fax, fax your appeal to (973) 599-6542.

To submit your appeal to USAC on paper, send your appeal to:

Letter of Appeal
 Schools and Libraries Division - Correspondence Unit
 30 Lanidex Plaza West
 PO Box 685
 Parsippany, NJ 07054-0685

For more information on submitting an appeal to USAC, please see "Appeals" in the Schools and Libraries section of the USAC website.

OBLIGATION TO PAY NON-DISCOUNT PORTION

Applicants are required to pay the non-discount portion of the cost of the products and/or services to their service provider(s). Service providers are required to bill applicants for the non-discount portion. The FCC stated that requiring applicants to pay their share ensures efficiency and accountability in the program. If USAC is being billed via the FCC Form 474, the service provider must bill the applicant at the same time it bills USAC. If USAC is being billed via the FCC Form 472, the applicant pays the service provider in full (the non-discount plus discount portion) and then seeks reimbursement from USAC. If you are using a trade-in as part of your non-discount portion, please refer to Disposal or Trade-in of Equipment posted in the Reference Area of our website for more information.

NOTICE ON RULES AND FUNDS AVAILABILITY

Applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with all such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds.

Schools and Libraries Division
 Universal Service Administrative Company

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FUNDING COMMITMENT REPORT
Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2740682
Funding Status: Funded
Service Type: Internet Access
FCC Form 470 Application Number: 115640001150426
SPIN: 143030626
Service Provider Name: Time Warner Cable Information Services (Ohio), LLC
Contract Number: 00003522
Billing Account Number: N/A
Service Start Date: 07/01/2015
Service End Date: N/A
Contract Award Date: 03/25/2015
Contract Expiration Date: 06/30/2017
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$36,432.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$36,432.00
Discount Percentage Approved by the USAC: 80%
Funding Commitment Decision: \$29,145.60 - ERN approved as submitted

FCDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

Canceled

FUNDING COMMITMENT REPORT
Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2742851
Funding Status: Not Funded
Service Type: Internet Access
FCC Form 470 Application Number: 115640001150426
SPIN: 143030626
Service Provider Name: Time Warner Cable Information Services (Ohio), LLC
Contract Number: 00003522
Billing Account Number: N/A
Service Start Date: 07/01/2015
Service End Date: N/A
Contract Award Date: 03/03/2014
Contract Expiration Date: 06/30/2016
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$15,540.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$15,540.00
Discount Percentage Approved by the USAC: 80%
Funding Commitment Decision: \$0.00 - Applicant request
Funding Commitment Decision Explanation: FRN canceled in consultation with the applicant.

FCDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

✓

FUNDING COMMITMENT REPORT
Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2745196
Funding Status: Funded
Service Type: Internet Access
FCC Form 470 Application Number: 115640001150426
SPIN: 143030626
Service Provider Name: Time Warner Cable Information Services (Ohio), LLC
Contract Number: 00003522
Billing Account Number: N/A
Service Start Date: 07/01/2015
Service End Date: N/A
Contract Award Date: 03/03/2014
Contract Expiration Date: 06/30/2016
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$8,039.64
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$8,039.64
Discount Percentage Approved by the USAC: 80%
Funding Commitment Decision: \$6,431.71 - FRN approved as submitted

FCDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

✓

FUNDING COMMITMENT REPORT

Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2745223
Funding Status: Funded
Service Type: Internet Access
FCC Form 470 Application Number: 115640001150426
SPIN: 143030626
Service Provider Name: Time Warner Cable Information Services (Ohio), LLC
Contract Number: 00003522
Billing Account Number: N/A
Service Start Date: 07/01/2015
Service End Date: N/A
Contract Award Date: 03/03/2014
Contract Expiration Date: 06/30/2016
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$26,724.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$26,724.00
Discount Percentage Approved by the USAC: 80%
Funding Commitment Decision: \$21,379.20 - FRN approved as submitted

FCDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

✓

FUNDING COMMITMENT REPORT
Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015



Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2783637
Funding Status: Funded
Service Type: Voice Services
FCC Form 470 Application Number: 146500001272220
SPIN: 143001688
Service Provider Name: The Ohio Bell Telephone Company
Contract Number: MTM
Billing Account Number: 614 R02-3000
Service Start Date: 07/01/2015
Service End Date: 06/30/2016
Contract Award Date: N/A
Contract Expiration Date: N/A
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$5,040.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$5,040.00
Discount Percentage Approved by the USAC: 60%
Funding Commitment Decision: \$3,024.00 - FRN approved as submitted

FCDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

✓

FUNDING COMMITMENT REPORT
Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2791128
Funding Status: Funded
Service Type: Voice Services
FCC Form 470 Application Number: 146500001272220
SPIN: 143003988
Service Provider Name: Easton Telecom Services, LLC
Contract Number: MTM
Billing Account Number: 20061 16001
Service Start Date: 07/01/2015
Service End Date: 06/30/2016
Contract Award Date: 04/16/2015
Contract Expiration Date: N/A
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$108,000.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$108,000.00
Discount Percentage Approved by the USAC: 60%
Funding Commitment Decision: \$64,800.00 - FRN approved as submitted

FCDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

✓

FUNDING COMMITMENT REPORT
Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2791160
Funding Status: Funded
Service Type: Voice Services
FCC Form 470 Application Number: 146500001272220
SPIN: 143000677
Service Provider Name: Verizon Wireless (Cellco Partnership)
Contract Number: MTM
Billing Account Number: 981753015-00001
Service Start Date: 07/01/2015
Service End Date: 06/30/2016
Contract Award Date: N/A
Contract Expiration Date: N/A
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$20,624.64
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$20,624.64
Discount Percentage Approved by the USAC: 60%
Funding Commitment Decision: \$12,374.78 - ERN approved as submitted

FCDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

Denial

FUNDING COMMITMENT REPORT
Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2791199
Funding Status: Not Funded
Service Type: Internet Access
FCC Form 470 Application Number: 146500001272220
SPIN: 143000677
Service Provider Name: Verizon Wireless (Cellco Partnership)
Contract Number: MTM
Billing Account Number: N/A
Service Start Date: 07/01/2015
Service End Date: 06/30/2016
Contract Award Date: N/A
Contract Expiration Date: N/A
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$56,145.96
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$56,145.96
Discount Percentage Approved by the USAC: 80%
Funding Commitment Decision: \$0.00 - Ineligible Services/Products
Funding Commitment Decision Explanation: DR1: Thirty percent or more of this FRN includes a request for off-premise usage, which is an ineligible service based on Program rules. <><><><><> DR2: Per the FCC Order 14-99, individual data plans and air cards are ineligible unless applicants can demonstrate either that installing a wireless local area network is not physically possible or that individual data plans are the most cost-effective option. You have not demonstrated that either of the two exceptions applies to services requested in FRN 2791199. Therefore, FRN is denied since services requested are ineligible.

ECDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

✓

FUNDING COMMITMENT REPORT
Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2791240
Funding Status: Funded
Service Type: Voice Services
FCC Form 470 Application Number: 146500001272220
SPIN: 143030766
Service Provider Name: Windstream Communications, LLC
Contract Number: MTM
Billing Account Number: 113944
Service Start Date: 07/01/2015
Service End Date: 06/30/2016
Contract Award Date: N/A
Contract Expiration Date: N/A
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$11,105.76
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$11,105.76
Discount Percentage Approved by the USAC: 60%
Funding Commitment Decision: \$6,663.46 - FRN approved; modified by SLD
Funding Commitment Decision Explanation: The amount of the funding request was
changed from \$987.88 per month to \$925.48 per month to remove: \$62.40/month for
ineligible DIDs.

FCDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

✓

FUNDING COMMITMENT REPORT
Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2791779
Funding Status: Funded
Service Type: Voice Services
FCC Form 470 Application Number: 146500001272220
SPIN: 143003988
Service Provider Name: Easton Telecom Services, LLC
Contract Number: N/A
Billing Account Number: 2010 214000
Service Start Date: 07/01/2015
Service End Date: N/A
Contract Award Date: 03/25/2015
Contract Expiration Date: 06/30/2016
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$44,976.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$44,976.00
Discount Percentage Approved by the USAC: 60%
Funding Commitment Decision: \$26,985.60 - FRN approved as submitted

FCDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

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Dent

FUNDING COMMITMENT REPORT
Billed Entity Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
BEN: 221005
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1009681
Funding Request Number: 2840474
Funding Status: Not Funded
Service Type: Internet Access
FCC Form 470 Application Number: 146500001272220
SPIN: 143003988
Service Provider Name: Easton Telecom Services, LLC
Contract Number: N/A
Billing Account Number: 2010 214000
Service Start Date: 07/01/2015
Service End Date: N/A
Contract Award Date: 03/25/2015
Contract Expiration Date: 06/30/2016
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$722,124.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$722,124.00
Discount Percentage Approved by the USAC: 80%
Funding Commitment Decision: \$0.00 - Cost Effectiveness
Funding Commitment Decision Explanation: DR1: The documentation provided did not sufficiently demonstrate the eligibility for discounts for the following item(s) according to Program rules: ECOT entity located at 535 Scherers Court, Worthington, OH 43085. <><><><><> DR2: Thirty percent or more of this FRN includes a request for services at a cyber-school entity utilized by students while located off-premise, which is an ineligible use based on Program rules. <><><><><> DR3: This funding request is denied as a result of a Cost Effectiveness Review, which has determined that your request for Internet Access has not been justified as being cost effective as required by FCC Rules. This request is for Internet Access at a cost of \$722,124.00 which, for a school that does not have any students located on site, is excessive and not cost effective.

FCDL Date: 03/24/2016
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2017
Consultant Name: Greg Spencer
Consultant Registration Number (CRN): 16062188
Consultant Employer: WGS Consulting

Exhibit B

FCC Form 470

Approval by OMB
3060-0806

Schools and Libraries Universal Service Description of Services Requested and Certification Form 470

Estimated Average Burden Hours per Response: 3 hours

This form is designed to help you describe the eligible services you seek so that this data can be posted on the Fund Administrator Internet Site and interested service providers can identify you as a potential customer and compete to serve you.

Please read instructions before beginning this form.

Form 470 Application Number: 146500001272220	Applicant's Form Identifier: FY15-1
Application Status: CERTIFIED	Posting Date: 01/28/2015
Allowable Contract Date: 02/25/2015	Certification Received Date: 01/28/2015

Block 1: Applicant Address and Information

1 Name of Applicant:
ELECTRONIC CLASSROOM OF TOMORROW (ECOT)

2 Funding Year: 2015 (Funding years run from July 1 through the following June 30)

3 Entity Number: 221005

4a Street Address, P.O.Box, or Route Number:
3700 SOUTH HIGH STREET, SUITE 95

City: COLUMBUS State: OH Zip Code: 43207 -0000

4b Telephone Number: (614) 492 -8884

4c Fax Number: (614) 492 -8894

5a Eligible Entities That Will Receive Services:
Check the ONE choice in **5a** that best describes the eligible entities that will receive the services described in this form. You will then list in Item **15** the entity/entities that will pay the bills for these services.

☒ Individual School (individual public or non-public school)

☐ School District (LEA; public or non-public [e.g., diocesan] local district representing multiple schools)

☐ Library (including library system, library outlet/branch or library consortium as defined under LSTA)

☐ Consortium (intermediate service agencies, states, state networks, consortia of schools and/or libraries)

☐ Statewide application for (enter 2-letter state code)

representing (check all that apply)

☐ All public schools/districts in the state

☐ All non-public schools in the state

☐ All libraries in the state

5b Recipient(s) of Services - Check all that apply:

☐ Private ☒ Public ☒ Charter

☐ Tribal ☐ Head Start ☐ State Agency

5c Number of eligible entities for which services are sought: 3

Block 1: Applicant Address and Information (continued)

6a Contact Person's Name:
Greg Spencer

If the Contact Person's Street Address is the same as **Item 4a** above, check here. ☐ If not, complete Item 6b.

6b Street Address, P.O.Box, or Route Number:
NOTE: USAC will use this address to mail correspondence
7512 Tottenham Place

City: New Albany State: OH Zip Code: 43054 -9444

Check the box next to your preferred mode of contact and provide your contact information. One box **MUST** be checked and an entry provided.

☐ **6c** Telephone Number: (614) 989 -5399

☐ **6d** Fax Number: (614) 882 -2556

☒ **6e** E-Mail Address: wgs003@gmail.com

Re-enter E-mail Address: wgs003@gmail.com

If a consultant is assisting you with your application process, please complete Item 7 below:

7 Consultant Name: WGS Consulting

Name of Consultant's Employer: WGS Consulting

Consultant's Street Address: 7512 Tottenham Place

City: New Albany State: OH Zip Code: 43054

Consultant's Telephone Number: (614) 989-5399 Ext.

Consultant's Fax Number: (614) 882-2556

Consultant's E-mail Address: wgs003@gmail.com

Re-enter E-mail Address: wgs003@gmail.com

Consultant Registration Number: 16062188

Entity Number: 221005	Applicant's Form Identifier: FY15-1
Contact Person: Greg Spencer	Phone Number: (614) 989-5399
Block 2: Summary Description of Needs or Services Requested	
8 Category One: Internet Access and/or Telecommunications	
<i>If you check YES to indicate you have a Request for Proposals (RFP) that specifies the services you are seeking, your RFP must be available to all interested bidders for at least 28 days. If your RFP is not available to all interested bidders, or if you check NO and you have or intend to have an RFP, you risk denial of your funding requests.</i>	
a <input type="checkbox"/> YES, I have released or intend to release an RFP for one or more of these services. It is available or will become available on the Internet at: or via (check one) <input type="checkbox"/> the contact person in Item 6 or <input type="checkbox"/> the contact person listed in Item 12 Your RFP Identifier:	
b <input checked="" type="checkbox"/> NO, I have not released and do not intend to release an RFP for any of these services.	
Whether you check YES or NO, you must list below the Internet access and/or telecommunications you seek. Specify each service (e.g., voice service, monthly Internet access service, etc) and quantity and/or capacity (e.g., for voice service, 20 existing lines plus 10 new ones, or for monthly Internet access service, for 500 users).	
Service	Quantity and/or Capacity
Internet Access Service	Minimum of 1.544mbps - All instructional, administrative, and non-instructional facilities
Telephone Services	All instructional, administrative, and non-instructional facilities
Wireless Internet Access Services	All instructional, administrative, and non-instructional facilities
Digital Transmission Services	Minimum of 1.544mbps - All instructional, administrative, and non-instructional facilities
9 [Reserved]	

Entity Number: 221005	Applicant's Form Identifier: FY15-1
Contact Person: Greg Spencer	Phone Number: (614) 989-5399
10 Category Two: Internal Connections and Managed Internal Broadband Services	
<i>If you check YES to indicate you have a Request for Proposals (RFP) that specifies the services you are seeking, your RFP must be available to all interested bidders for at least 28 days. If your RFP is not available to all interested bidders, or if you check NO and you have or intend to have an RFP, you risk denial of your funding requests.</i>	
<p>a <input type="checkbox"/> YES, I have released or intend to release an RFP for one or more of these services. It is available or will become available on the Internet at: or via (check one) <input type="checkbox"/> the contact person in Item 6 or <input type="checkbox"/> the contact person listed in Item 12</p> <p>Your RFP Identifier:</p>	
<p>b <input type="checkbox"/> NO, I have not released and do not intend to release an RFP for any of these services.</p> <p>Whether you check YES or NO, you must list below the Internal Connections and Managed Internal Broadband Services you seek. Specify each service (e.g., a router, hub and cabling) and quantity and/or capacity (e.g., connecting 1 classroom of 30 students).</p>	
<hr/>	
11 Category Two: Basic Maintenance of Internal Connections	
<i>If you check YES to indicate you have a Request for Proposals (RFP) that specifies the services you are seeking, your RFP must be available to all interested bidders for at least 28 days. If your RFP is not available to all interested bidders, or if you check NO and you have or intend to have an RFP, you risk denial of your funding requests.</i>	
<p>a <input type="checkbox"/> YES, I have released or intend to release an RFP for these services. It is available or will become available on the Internet at: or via (check one) <input type="checkbox"/> the contact person in Item 6 or <input type="checkbox"/> the contact person listed in Item 12</p> <p>Your RFP Identifier:</p>	
<p>b <input type="checkbox"/> NO, I have not released and do not intend to release an RFP for these services.</p> <p>Whether you check YES or NO, you must list below the Basic Maintenance services you seek. Specify each service (e.g., basic maintenance of routers) and quantity and/or capacity (e.g., for 10 routers).</p>	
<hr/>	

Entity Number: 221005	Applicant's Form Identifier: FY15-1				
Contact Person: Greg Spencer	Phone Number: (614) 989-5399				
<p>12 (Optional) Please name the person on your staff or project who can provide additional technical details or answer specific questions from service providers about the services you are seeking. This person does not need to be the contact person(s) listed in Item 6 nor the Authorized Person who signs this form.</p> <p>Name: Becki Shallenberger</p> <p>Title: Coordinator</p> <p>Telephone Number: (614) 492 - 8884</p> <p>Fax Number: (614) 492 - 8894</p> <p>Email Address: becki.shallenberger@ecotoh.org</p> <p>Re-enter E-mail Address: becki.shallenberger@ecotoh.org</p> <p>13 <input type="checkbox"/> Check this box if there are any restrictions imposed by state or local laws or regulations on how or when service providers may contact you or on other bidding procedures. Please describe below any such restrictions or procedures and/or provide an Internet address where they are posted and a contact name and telephone number.</p> <p><input checked="" type="checkbox"/> Check this box if no state and local procurement/competitive bidding requirements apply to the procurement of services sought on this FCC Form 470.</p> <p>If you are requesting services for a funding year for which an FCC Form 470 cannot yet be filed online, include that information here.</p>					
Block 3:					
14. [Reserved]					
Entity Number: 221005	Applicant's Form Identifier: FY15-1				
Contact Person: Greg Spencer	Contact Phone Number: (614) 989-5399				
Block 4: Recipients of Service					
<p>15 Billed Entities</p> <p>List the entity/entities that will be paying the bills directly to the provider for the services requested in this form. These are known as Billed Entities. At least one line of this item must be completed. If a Billed Entity cited on your FCC Form 471 is not listed below, funding may be denied for the funding requests associated with this FCC Form 470. Attach additional pages if needed.</p> <table><thead><tr><th>Entity Number</th><th>Entity Name</th></tr></thead><tbody><tr><td>221005</td><td>ELECTRONIC CLASSROOM OF TOMORROW (ECOT)</td></tr></tbody></table>		Entity Number	Entity Name	221005	ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
Entity Number	Entity Name				
221005	ELECTRONIC CLASSROOM OF TOMORROW (ECOT)				

Entity Number: 221005		Applicant's Form Identifier: FY15-1	
Contact Person: Greg Spencer		Contact Phone Number: (614) 989-5399	
Block 5: Certifications and Signature			
16	I certify that the applicant includes: (Check one or both.)		
a	<input checked="" type="checkbox"/>	schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. §§ 7801 (18) and (38) , that do not operate as for-profit businesses, and do not have endowments exceeding \$50 million; and/or	
b	<input type="checkbox"/>	libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any schools (including, but not limited to elementary and secondary schools, colleges, and universities).	
17	[Reserved]		
18	<input checked="" type="checkbox"/>	I certify that I will post my FCC Form 470 and (if applicable) make any applicable RFP available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted will be carefully considered and the bid selected will be for the most cost-effective service or equipment offering, with price being the primary factor, and will be the most cost-effective means of meeting educational needs and technology goals.	
19	<input checked="" type="checkbox"/>	I certify that I will retain required documents for a period of at least 10 years (or whatever retention period is required by the rules in effect at the time of this certification) after the last day of service delivered. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the form for, receipt of, and delivery of services receiving schools and libraries discounts. I acknowledge that I may be audited pursuant to participation in the schools and libraries program.	
20	<input checked="" type="checkbox"/>	I certify that the services the applicant purchases at discounts provided by 47 U.S.C. § 254 will be used primarily for educational purposes, see 47 C.F.R. § 54.500, and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. § 54.513. Additionally, I certify that the entity or entities listed on this form have not received anything of value or a promise of anything of value, other than services and equipment sought by means of this form, from the service provider, or any representative or agent thereof or any consultant in connection with this request for services.	
21	<input checked="" type="checkbox"/>	I acknowledge that support under this support mechanism is conditional upon the school(s) and/or library(ies) I represent securing access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that I have considered what financial resources should be available to cover these costs.	
22	<input checked="" type="checkbox"/>	I certify that I am authorized to procure eligible services for the eligible entity(ies). I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this form, that I have examined this request, and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.	
23	<input checked="" type="checkbox"/>	I certify that I have reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that I have complied with them. I acknowledge that persons willfully making false statements on this form may be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	
24	<input checked="" type="checkbox"/>	I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program.	
Entity Number: 221005		Applicant's Form Identifier: FY15-1	
Contact Person: Greg Spencer		Contact Phone Number: (614) 989-5399	
25	Signature of authorized person: <input checked="" type="checkbox"/>		26 Date: 01/28/2015
27a	Printed name of authorized person: Brad C. Scott		
27b	Title or position of authorized person: Director of IT Services <input type="checkbox"/> Check here if the consultant in Item 7 is the Authorized Person.		
27c	Street Address, P.O. Box, Route Number, City, State, Zip Code: 3700 South High Street Suite 95 City: Columbus State: OH Zip Code: 43207		
27d	Telephone Number of Authorized Person: (614) 492-8884		
27e	Fax Number of Authorized Person: (614) 492-8894		
27f	E-mail Address of Authorized Person: Brad.Scott@ecotoh.org Re-enter E-mail Address: Brad.Scott@ecotoh.org		
27g	Name of Authorized Person's Employer: Electronic Classroom of Tomorrow		
<p align="center">Service provider involvement with preparation or certification of an FCC Form 470 can taint the competitive bidding process and result in the denial of funding requests. For more information, refer to the Schools and Libraries area of the USAC web site at www.usac.org/si or call the SLD Client Service Bureau at 1-888-203-8100.</p>			

Entity Number: 221005	Applicant's Form Identifier: FY15-1
Contact Person: Greg Spencer	Phone Number: (614) 989-5399

NOTICE: In accordance with Section 54.503 of the Federal Communications Commission's rules, certain schools and libraries ordering services that are eligible for and seeking universal service discounts must file this Description of Services Requested and Certification Form (FCC Form 470) with the Universal Service Administrator. 47 C.F.R. § 54.503 (c). The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended. 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the competitive bidding requirement contained in 47 C.F.R. § 54.503. Schools and libraries must file this form themselves or as part of a consortium.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving this application is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, information provided in or submitted with this form or in response to subsequent inquiries may also be subject to disclosure consistent with the Communications Act of 1934, FCC regulations, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law.

If you owe a past due debt to the federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized.

If you do not provide the information we request on the form, the FCC may delay processing of your application or may return your form without action.

The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, *et seq.*

Public reporting burden for this collection of information is estimated to average 3 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554.

FCC Form 470
October 2014

[New Search](#)

[Return To Search Results](#)

Exhibit C

Applicant: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
Billed Entity Number: 221005
Date Submitted: Apr 16, 2015

Application Number: 1009681
Nickname: FY15 -1
Date Certified: Apr 16, 2015

Original Form Data ✓

Current Form Data

Basic Information

[+ Expand All](#) [- Collapse All](#) [^ Scroll to](#)

Billed Entity

Name of Billed Entity: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
Billed Entity Number: 221005
FCC Registration Number: 0014369185
Address 1: 3700 SOUTH HIGH STREET, SUITE 95
City: COLUMBUS **State:** OH **Zip Code:** 43207
Telephone Number: (614) 492-8884 **Ext:** None Provided
Fax Number: (614) 492-8894

Application Type and Recipients of Service

Type of Application: School
Recipients of Services: Charter
Submitter's Email Address: wgs003@gmail.com

Contact Information

Consultant Registration Number: 16062188
Consultant Name: Greg Spencer
Is a consultant acting as the contact person for this application?
Contact Person's Name: Greg Spencer
Contact Person's Email Address: wgs003@gmail.com
Is the contact person's address the same as that of the Billed Entity? No
Contact Person's Address: 7512 Tottenham Place
City: New Albany **State:** OH **Zip Code:** 43054
Contact Person's Telephone Number: (614) 989-5399 **Ext:** 0
Contact Person's Fax Number: (614) 882-2556
Correspondence Address: Consultant Address
Name of person to receive correspondence: Greg Spencer
Holiday / Summer Contact Information:

Discount Calculation

[+ Expand All](#) [- Collapse All](#) [^ Scroll to](#)

Funding Request Category: Category 1

ELECTRONIC CLASSROOM OF TOMORROW (ECOT) - 221005

Entities

Billed Entity Number	Entity Name	NCES Code	Urban or Rural	NIF	State LEA ID	State School ID	Student Count Based on Est. ?	Alt. Disc.	Attributes
221005	ELECTRONIC CLASSROOM OF TOMORROW (ECOT)	390007 903420	U	No		133413	No	Survey	
16064648	ELECTRONIC CLASSROOM OF TOMORROW - REC			Yes			No	Survey	
16084834	ECOT TESTING CENTER - DUBLIN			Yes			No	Survey	Charter School
16084835	ECOT TESTING CENTER - CLEVELAND			Yes			No	Survey	Charter School

Entities

Optional Worksheet

Entity #	Entity Name	Urban Rural	Number of Students Attending This School as Their Home School	If Using CEP, Percentage of Direct Certification Students	Total Number of Students in School Eligible for NSLP
221005	ELECTRONIC CLASSROOM OF TOMORROW (ECOT)	U	16046		10722

Entity #	Entity Name	Urban Rural	Number of Students Attending This School as Their Home School	If Using CEP, Percentage of Direct Certification Students	Total Number of Students in School Eligible for NSLP
16064648	ELECTRONIC CLASSROOM OF TOMORROW - REC				
16084834	ECOT TESTING CENTER - DUBLIN				
16084835	ECOT TESTING CENTER - CLEVELAND				

 [Optional Worksheet](#)

Discount Rate Calculation

Overall Urban/Rural Status	Total Number of Students Enrolled in District	Total Number of Students in District Eligible for NSLP	Percentage of Students in District Eligible for NSLP	Category 1 Discount Rate
U	16046	10722	67%	80%

 [ELECTRONIC CLASSROOM OF TOMORROW \(ECOT\) - 221005](#)

Connectivity Questions

Does the school district (or school, if not part of a district) have Internet access of

- ☒ less than 100 Mbps per 1,000 users (students and staff)
- ☐ at least 100 Mbps per 1,000 users but less than 1Gbps per 1,000 users
- ☐ at least 1 Gbps per 1,000 users

How many of the schools in the school district have Wide Area Networking connections that are scalable to 10 Gbps? 0

How many schools in your school district have LAN/WLAN capacity and coverage

- completely sufficient to support the educational or library activities conducted here? 0
- mostly sufficient to support the educational or library activities conducted here? 0
- sometimes sufficient to support the educational or library activities conducted here? 0
- rarely sufficient to support the educational or library activities conducted here? 0
- not sufficient to support the educational or library activities conducted here? 0

Funding Requests

 [Expand All](#)  [Collapse All](#)  [Scroll to](#)

 [Ver-2 - 2791199](#)

Key Information

Duplicate Funding Request Number:

Service Type: INTERNET ACCESS

Form470 Number: 146500001272220

Exempt470 Reason:

SPIN (Service Provider Identification Number): 143000677

SPIN Name: Verizon Wireless (Cellco Partnership)

Billing Account Number: N/A

Narrative:

Monthly wireless Internet Access service for 17 aircards and 100 USF devices. ECOT is a completely electronic school of more than 16,000 students. This wireless Internet Access is utilized by staff at multiple statewide public location testing sites. Because these sites are temporary locations, this type of Internet Access is the most cost effective method for our staff to monitor, communicate, and report during testing sessions and student visits. It is not possible to install permanent Internet Access services at these locations.

Purchase Type: MONTHLY**When will the services start?** 07/01/2015**When will the services end?** 06/30/2016**Is there a statute, rule, or other restriction which prohibits publication of the pricing information?** No**Type of restriction:****Restriction Citation:**

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Burst Bandwidth?	Last Mile?	Firewall?	Monthly Cost Eligible	One Time Cost Eligible	Extended Cost
					Download Speed	Burst Speed		WAN?	Ineligible	Ineligible	
1	Wireless Service	Data Plan/Air Card Service	Internet	119	5Mbps	Yes	No	No	\$4,678.83	\$0.00	\$56,145.5
					2Mbps	12Mbps		No	\$0.00	\$0.00	

Entity # Entity Name

16064648	ELECTRONIC CLASSROOM OF TOMORROW - REC
221005	ELECTRONIC CLASSROOM OF TOMORROW (ECOT)

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$44,916

Monthly Charges

Total Charges:	\$4,678.83 (monthly)
Ineligible charges:	- \$0.00 (monthly)
Eligible monthly pre-discount amount:	\$4,678.83
Total number of months of service:	x 12
Total annual recurring charges:	\$56,145.96

Total One-time Charges

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$56,145.96
Discount Rate:	x 80%
Funding Commitment Request:	\$44,916.77

Ver-2 - 2791199

Easton-2 - 2791128

Key Information

Duplicate Funding Request Number:

Service Type: VOICE SERVICES

Form470 Number: 146500001272220

Exempt470 Reason:

SPIN (Service Provider Identification Number): 143003988

SPIN Name: Easton Telecom Services, LLC

Billing Account Number: 20061 16001

Purchase Type: MONTHLY

When will the services start? 07/01/2015

When will the services end? 06/30/2016

Narrative:

Long distance services for 506 lines for the Administrative Office.

Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No

Type of restriction:

Restriction Citation:

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed Download Speed	Burst Bandwidth? Burst Speed	Last Mile?	Firewall? WAN?	Monthly Cost Eligible Ineligible	One Time Cost Eligible Ineligible	Extended Cost
1	Voice Service	Local/Long Distance Service	Voice	506		No	No	No No	\$9,000.00 \$0.00	\$0.00 \$0.00	\$108,000.00
Entity #		Entity Name									
221005		ELECTRONIC CLASSROOM OF TOMORROW (ECOT)									

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$64,800

Monthly Charges

Total Charges:	\$9,000.00 (monthly)
Ineligible charges:	- \$0.00 (monthly)
Eligible monthly pre-discount amount:	\$9,000.00
Total number of months of service:	x 12
Total annual recurring charges:	\$108,000.00

Total One-time Charges

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$108,000.00
Funding Commitment Request:	\$64,800.00

Discount Rate: x 60%

Funding Commitment Request: \$64,800.00

Easton-2 - 2791128

Ver-1 - 2791160

Key Information

Duplicate Funding Request Number:

Service Type: VOICE SERVICES

Form470 Number: 146500001272220

Exempt470 Reason:

SPIN (Service Provider Identification Number): 143000677

SPIN Name: Verizon Wireless (Cellco Partnership)

Billing Account Number: 981753015-00001

Purchase Type: MONTHLY

When will the services start? 07/01/2015

When will the services end? 06/30/2016

Narrative:

Monthly cellular service for 162 staff telephones.

Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No

Type of restriction:

Restriction Citation:

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Burst Bandwidth?	Last Mile?	Firewall?	Monthly Cost Eligible	One Time Cost Eligible	Extended Cost
					Download Speed	Burst Speed		WAN?	Ineligible	Ineligible	
1	Voice Service	Cellular Voice Service	Voice	131		No	No	No	\$1,718.72	\$0.00	\$20,624.64
								No	\$0.00	\$0.00	

Entity # Entity Name

221005 ELECTRONIC CLASSROOM OF TOMORROW (ECOT)

16064648 ELECTRONIC CLASSROOM OF TOMORROW - REC

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$12,374

Monthly Charges

Total Charges: \$1,718.72 (monthly)

Ineligible charges: - \$0.00 (monthly)

Eligible monthly pre-discount amount: \$1,718.72

Total number of months of service: x 12

Total annual recurring charges: \$20,624.64

Total One-time Charges

Eligible annual pre-discount amount: \$0.00

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$20,624.64
Discount Rate:	x 60%
Funding Commitment Request:	\$12,374.78

[Ver-1 - 2791160](#)[Wind-1 - 2791240](#)[Key Information](#)**Duplicate Funding Request Number:****Service Type:** VOICE SERVICES**Form470 Number:** 146500001272220**Exempt470 Reason:****SPIN (Service Provider Identification Number):** 143030766**SPIN Name:** Windstream Communications, LLC**Billing Account Number:** 113944**Purchase Type:** MONTHLY**When will the services start?** 07/01/2015**When will the services end?** 06/30/2016**Narrative:**

Digital transmission services for the Administrative Offices and NIF.

Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No**Type of restriction:****Restriction Citation:**[Item 21 Details](#)

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Burst Bandwidth?	Last Mile?	Firewall?	Monthly Cost Eligible	One Time Cost Eligible	Extended Cost
					Download Speed	Burst Speed		WAN?	Ineligible	Ineligible	
1	Voice Service	PRI (ISDN)	Voice	4		No	No	No	\$987.88	\$0.00	\$11,854.5
								No	\$0.00	\$0.00	

Entity #	Entity Name
221005	ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
16064648	ELECTRONIC CLASSROOM OF TOMORROW - REC
16084834	ECOT TESTING CENTER - DUBLIN
16084835	ECOT TESTING CENTER - CLEVELAND

[Item 21 Details](#)[Funding Request Summary](#)

Total Post Discount Request: \$7,112

Monthly Charges

Total Charges:	\$987.88 (monthly)
Ineligible charges:	- \$0.00 (monthly)
Eligible monthly pre-discount amount:	\$987.88
Total number of months of service:	x 12
Total annual recurring charges:	\$11,854.56

Total One-time Charges

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$11,854.56
Discount Rate:	x 60%
Funding Commitment Request:	\$7,112.74

Wind-1 - 2791240

ATT-1 - 2783637

Key Information

Duplicate Funding Request Number:**Service Type:** VOICE SERVICES**Form470 Number:** 146500001272220**Exempt470 Reason:****SPIN (Service Provider Identification Number):** 143001688**SPIN Name:** The Ohio Bell Telephone Company**Billing Account Number:** 614 R02-3000, 614 491-9974**Purchase Type:** MONTHLY**When will the services start?** 07/01/2015**When will the services end?** 06/30/2016**Narrative:**

Telephone services for Administrative Offices. Monthly POTS service for 12 fax lines.

Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No**Type of restriction:****Restriction Citation:**

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed Download Speed	Burst Bandwidth? Burst Speed	Last Mile?	Firewall? WAN?	Monthly Cost Eligible Ineligible	One Time Cost Eligible Ineligible	Extended Cost
1	Voice Service	Local Phone Service Only	Voice	12		No	No	No No	\$420.00 \$0.00	\$0.00 \$0.00	\$5,040.00
Entity #		Entity Name									
221005		ELECTRONIC CLASSROOM OF TOMORROW (ECOT)									

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$3,024

Monthly Charges

Total Charges:	\$420.00 (monthly)
Ineligible charges:	- \$0.00 (monthly)
Eligible monthly pre-discount amount:	\$420.00
Total number of months of service:	x 12
Total annual recurring charges:	\$5,040.00

Total One-time Charges

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$5,040.00
Discount Rate:	x 60%
Funding Commitment Request:	\$3,024.00

ATT-1 - 2783637

Easton-1 - 2791779

Key Information

Duplicate Funding Request Number:
Service Type: VOICE SERVICES
Form470 Number: 146500001272220
Exempt470 Reason:
SPIN (Service Provider Identification Number): 143003988
SPIN Name: Easton Telecom Services, LLC
Billing Account Number: 2010 214000
Purchase Type: CONTRACT
Contract Number: N/A
What is the date you awarded your contract? 03/25/2015
What is the date your contract expires? 06/30/2016
When will the services start? 07/01/2015

Does your contract have any voluntary extensions? No
How many extensions are left on the contract?
What is the total remaining length of the contract if you exercised all extensions (in months)?
Is this Funding Request covered under a master contract? No
Is this Funding Request a continuation of an FRN from a previous funding year based on a multi-year contract? No
Previous FRN Number:
Narrative:
 Two ISDN PRI circuits and one DS-3 circuit for voice services for the Administrative Offices and NIF.
Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No
Type of restriction:
Restriction Citation:

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Burst Bandwidth?	Last Mile?	Firewall?	Monthly Cost Eligible	One Time Cost Eligible	Extended Cost
					Download Speed	Burst Speed		WAN?	Ineligible	Ineligible	
2	Voice Service	Long Distance Phone Service Only	Voice	1		No	No	No	\$3,150.00	\$0.00	\$37,800.00
								No	\$0.00	\$0.00	

Entity #	Entity Name
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16064648	ELECTRONIC CLASSROOM OF TOMORROW - REC
221005	ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
16084834	ECOT TESTING CENTER - DUBLIN
16084835	ECOT TESTING CENTER - CLEVELAND

1	Voice Service	PRI (ISDN)	Voice	2		No	No	No	\$598.00	\$0.00	\$7,176.00
								No	\$0.00	\$0.00	

Entity #	Entity Name
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221005	ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
16064648	ELECTRONIC CLASSROOM OF TOMORROW - REC

[Item 21 Details](#)
[Funding Request Summary](#)

Total Post Discount Request: \$26,985

Monthly Charges

Total Charges:	\$3,748.00 (monthly)
Ineligible charges:	- \$0.00 (monthly)
Eligible monthly pre-discount amount:	\$3,748.00
Total number of months of service:	x 12
Total annual recurring charges:	\$44,976.00

Total One-time Charges

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$44,976.00
Discount Rate:	x 60%
Funding Commitment Request:	\$26,985.60

Easton-1 - 2791779

Easton-3 - 2840474

Key Information

Duplicate Funding Request Number:

Service Type: INTERNET ACCESS

Form470 Number: 146500001272220

Exempt470 Reason:

SPIN (Service Provider Identification Number): 143003988

SPIN Name: Easton Telecom Services, LLC

Billing Account Number: 2010 214000

Purchase Type: CONTRACT

Contract Number: N/A

What is the date you awarded your contract? 03/25/2015

What is the date your contract expires? 06/30/2016

When will the services start? 07/01/2015

Does your contract have any voluntary extensions? No

How many extensions are left on the contract?

What is the total remaining length of the contract if you exercised all extensions (in months)?

Is this Funding Request covered under a master contract? No

Is this Funding Request a continuation of an FRN from a previous funding year based on a multi-year contract? No

Previous FRN Number:

Narrative:

Monthly Internet Access Services for Administrative Offices/NIFs

Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No

Type of restriction:

Restriction Citation:

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Burst Bandwidth?	Last Mile?	Firewall?	Monthly Cost Eligible	One Time Cost Eligible	Extended Cost
					Download Speed	Burst Speed		WAN?	Ineligible	Ineligible	
1	Digital Transmission Service	Lit Fiber Service	Transport and Internet	1	3Gbps	No	No	Yes	\$60,177.00	\$0.00	\$722,124.00
					3Gbps			No	\$0.00	\$0.00	

Entity # Entity Name

221005	ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
16064648	ELECTRONIC CLASSROOM OF TOMORROW - REC
16084834	ECOT TESTING CENTER - DUBLIN
16084835	ECOT TESTING CENTER - CLEVELAND

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$577,699

Monthly Charges

Total Charges:	\$60,177.00 (monthly)
Ineligible charges:	- \$0.00 (monthly)
Eligible monthly pre-discount amount:	\$60,177.00
Total number of months of service:	x 12
Total annual recurring charges:	\$722,124.00

Total One-time Charges

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$722,124.00
Discount Rate:	x 80%
Funding Commitment Request:	\$577,699.20

Easton-3 - 2840474

TW-1 - 2740682

Key Information

Duplicate Funding Request Number:

Service Type: INTERNET ACCESS

Form470 Number: 115640001150426

Exempt470 Reason:

SPIN (Service Provider Identification Number): 143030626

SPIN Name:

Billing Account Number:

Purchase Type: CONTRACT

Contract Number: 00003522

What is the date you awarded your contract? 03/25/2015

What is the date your contract expires? 06/30/2017

When will the services start? 07/01/2015

Does your contract have any voluntary extensions? No

How many extensions are left on the contract?

What is the total remaining length of the contract if you exercised all extensions (in months)?

Is this Funding Request covered under a master contract? No

Is this Funding Request a continuation of an FRN from a previous funding year based on a multi-year contract? No

Previous FRN Number:

Narrative:

Internet access for Administrative Office and NIFS.

Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No

Type of restriction:

Restriction Citation:

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Burst Bandwidth?	Last Mile?	Firewall? WAN?	Monthly Cost Eligible	One Time Cost Eligible	Extended Cost
					Download Speed	Burst Speed			Ineligible	Ineligible	
1	Digital Transmission Service	Lit Fiber Service	Transport and Internet	1	500Mbps	No	No	Yes	\$3,036.00	\$0.00	\$36,432.00
					500Mbps			No	\$0.00	\$0.00	

Entity #

Entity Name

221005

ELECTRONIC CLASSROOM OF TOMORROW (ECOT)

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$29,145

Monthly Charges

Total Charges:	\$3,036.00 (monthly)
Ineligible charges:	- \$0.00 (monthly)
Eligible monthly pre-discount amount:	\$3,036.00
Total number of months of service:	x 12
Total annual recurring charges:	\$36,432.00

Total One-time Charges

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$36,432.00
Discount Rate:	x 80%
Funding Commitment Request:	\$29,145.60

TW-1 - 2740682

TW-2 - 2742851

Key Information

Duplicate Funding Request Number:	Does your contract have any voluntary extensions? No
Service Type: INTERNET ACCESS	How many extensions are left on the contract?
Form470 Number: 115640001150426	What is the total remaining length of the contract if you exercised all extensions (in months)?
Exempt470 Reason:	Is this Funding Request covered under a master contract? No
SPIN (Service Provider Identification Number): 143030626	Is this Funding Request a continuation of an FRN from a previous funding year based on a multi-year contract? Yes
SPIN Name:	Previous FRN Number: 2670020
Billing Account Number:	Narrative:
Purchase Type: CONTRACT	Metro Ethernet Point-to-Point 100mbps Access/Single Hub/Single Pa
Contract Number: 00003522	Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No
What is the date you awarded your contract? 03/03/2014	Type of restriction:
What is the date your contract expires? 06/30/2016	Restriction Citation:
When will the services start? 07/01/2015	

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Burst Bandwidth?	Last Mile?	Firewall?	Monthly Cost Eligible	One Time Cost Eligible	Extended Cost
					Download Speed	Burst Speed		WAN?	Ineligible	Ineligible	
1	Digital Transmission Service	Ethernet	Transport and Internet	1	100Mbps	No	No	Yes	\$1,295.00	\$0.00	\$15,540.00
					100Mbps			No	\$0.00	\$0.00	

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed Download Speed	Burst Bandwidth? Burst Speed	Last Mile?	Firewall? WAN?	Monthly Cost Eligible Ineligible	One Time Cost Eligible Ineligible	Extended Cost
Entity #	Entity Name										
221005	ELECTRONIC CLASSROOM OF TOMORROW (ECOT)										

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$12,432

Monthly Charges

Total Charges:	\$1,295.00 (monthly)
Ineligible charges:	- \$0.00 (monthly)
Eligible monthly pre-discount amount:	\$1,295.00
Total number of months of service:	x 12
Total annual recurring charges:	\$15,540.00

Total One-time Charges

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$15,540.00
Discount Rate:	x 80%
Funding Commitment Request:	\$12,432.00

TW-2 - 2742851

TW-3 - 2745196

Key Information

Duplicate Funding Request Number: Service Type: INTERNET ACCESS Form470 Number: 115640001150426 Exempt470 Reason: SPIN (Service Provider Identification Number): 143030626 SPIN Name: Billing Account Number: N/A Purchase Type: CONTRACT Contract Number: 00003522	Does your contract have any voluntary extensions? No How many extensions are left on the contract? What is the total remaining length of the contract if you exercised all extensions (in months)? Is this Funding Request covered under a master contract? No Is this Funding Request a continuation of an FRN from a previous funding year based on a multi-year contract? Yes Previous FRN Number: 2625892 Narrative: Monthly RoadRunner Business Class Internet Access Service
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What is the date you awarded your contract? 03/03/2014
 What is the date your contract expires? 06/30/2016
 When will the services start? 07/01/2015

Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No
 Type of restriction:
 Restriction Citation:

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Burst Bandwidth?	Last Mile?	Firewall?	Monthly Cost Eligible	One Time Cost Eligible	Extended Cost
					Download Speed	Burst Speed		WAN?	Ineligible	Ineligible	
<div><div></div><div>1</div></div>	Digital Transmission Service	Cable Modem	Transport and Internet	3	15Mbps	No	No	Yes	\$669.97	\$0.00	\$8,039.64
					2Mbps			No	\$0.00	\$0.00	
Entity #		Entity Name									
221005		ELECTRONIC CLASSROOM OF TOMORROW (ECOT)									

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$6,431

Monthly Charges

Total Charges:	\$669.97 (monthly)
Ineligible charges:	- \$0.00 (monthly)
Eligible monthly pre-discount amount:	\$669.97
Total number of months of service:	x 12
Total annual recurring charges:	\$8,039.64

Total One-time Charges

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$8,039.64
Discount Rate:	x 80%
Funding Commitment Request:	\$6,431.71

TW-3 - 2745196

TW-4 - 2745223

Key Information

Duplicate Funding Request Number:

Service Type: INTERNET ACCESS

Form470 Number: 115640001150426

Exempt470 Reason:

SPIN (Service Provider Identification Number): 143030626

SPIN Name:

Billing Account Number: N/A

Purchase Type: CONTRACT

Contract Number: 00003522

What is the date you awarded your contract? 03/03/2014

What is the date your contract expires? 06/30/2016

When will the services start? 07/01/2015

Does your contract have any voluntary extensions? No

How many extensions are left on the contract?

What is the total remaining length of the contract if you exercised all extensions (in months)?

Is this Funding Request covered under a master contract? No

Is this Funding Request a continuation of an FRN from a previous funding year based on a multi-year contract? Yes

Previous FRN Number: 2670065

Narrative:

Dedicated Internet Access to NIF located in Dayton, OH

Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No

Type of restriction:

Restriction Citation:

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Burst Bandwidth?	Last Mile?	Firewall?	Monthly Cost Eligible	One Time Cost Eligible	Extended Cost
					Download Speed	Burst Speed		WAN?	Ineligible	Ineligible	
1	Digital Transmission Service	Cable Modem	Transport and Internet	1	50Mbps	No	No	Yes	\$2,227.00	\$0.00	\$26,724.00
					50Mbps			No	\$0.00	\$0.00	

Entity # **Entity Name**

16064648 ELECTRONIC CLASSROOM OF TOMORROW - REC

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$21,379

Monthly Charges

Total Charges:	\$2,227.00 (monthly)
Ineligible charges:	- \$0.00 (monthly)
Eligible monthly pre-discount amount:	\$2,227.00
Total number of months of service:	x 12
Total annual recurring charges:	\$26,724.00

Total One-time Charges

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$26,724.00
Discount Rate:	x 80%
Funding Commitment Request:	\$21,379.20

TW-4 - 2745223

Certifications & Signatures

Expand All Collapse All Scroll to

I certify that the entities listed in Block 4 of this application are eligible for support because they are:

✓ schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. §§ 7801 and (38), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million; and/or

✓ I certify that the entity I represent or the entities listed on this application have secured access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that the entities I represent or the entities listed on this application have secured access to all of the resources to pay the discounted charges for eligible services from funds to which access has been secured in the current funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

A	Total funding year pre-discount amount on this FCC Form 471	\$1,055,500
B	Total funding commitment request amount on this FCC Form 471	\$806,301
C	Total applicant non-discount share	\$249,195
D	Total budgeted amount allocated to resources not eligible for E-rate support	\$5,134,985
E	Total amount necessary for the applicant to pay the non-discount share of the services requested on this application AND to secure access to the resource necessary to make effective use of the discounts	\$5,384,184

☐ Check this box if you are receiving any of the funds in Item E directly from a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year, or if a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year assisted you in locating funds in Item E.

✓ I certify that an FCC Form 470 was posted and that any related RFP was made available for at least 28 days before considering all bids received in selecting a service provider. I certify that all bids submitted were carefully considered and the most cost-effective service offering was selected, with being the primary factor considered, and is the most cost-effective means of meeting educational needs and technology goals.

✓ I certify that the entity responsible for selecting the service provider(s) has reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities listed on this application have complied with them.

✓ I certify that the services the applicant purchases at discounts provided by 47 U.S.C. § 254 will be used primarily for educational purposes, see C.F.R. § 54.500 and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. §§ 54.500, 54.513. Additionally, I certify that the entity or entities listed on this application have not received anything of value or a promise of anything of value, other than services and equipment sought by means of this form, from the service provider, or any representative or agent thereof or any consultant in connection with this request for services.

✓ I certify that I and the entity(ies) I represent have complied with all program rules, including recordkeeping requirements, and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There are signed contracts or other legally binding agreements covering all of the services listed on this FCC Form 471 except for those services provided under non-contracted tariffed or month-to-month arrangements. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.

✓ I acknowledge that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.

✓ I certify that I will retain required documents for a period of at least 10 years (or whatever retention period is required by the rules in effect at time of this certification), after the last day of service delivered. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts, and that if audited, I will make such records available to the Administrator. I acknowledge that I may be audited pursuant to participation in the schools and libraries program.

✓ I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) listed on this application. I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this application, that I have examined this request, that all the information on this form is true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to this application complied with the terms, conditions and purposes of the program, that no kickbacks were paid to anyone and that false statements on this form are punished by fine or forfeiture under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code 18 U.S.C. § 1001 and civil violations of the False Claims Act.

✓ I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities listed on this application or any person associated in any way with my entity and/or the entities listed on this application, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.

✓ I certify that if any of the Funding Requests on this FCC Form 471 are for discounts for products or services that contain both eligible and ineligible components, that I have allocated the eligible and ineligible components as required by the Commission's rules at 47 C.F.R. § 54.504(g)(1), (2).

✓ I certify that the non-discount portion of the costs for eligible services will not be paid by the service provider. The pre-discount costs of eligible services featured on this FCC Form 471 are net of any rebates or discounts offered by the service provider. I acknowledge that, for the purpose of the rule, the provision, by the provider of a supported service, of free services or products unrelated to the supported service or product constitutes a rebate of some or all of the cost of the supported services.

Authorized Person

Name of authorized person: Brad C. Scott

Title or position of authorized person: Director of IT Services

Street address, P.O. Box or Route Number of authorized person (1):

3700 South High Street

Street address, P.O. Box or Route Number of authorized person (2):

Suite 95

City of authorized person: Columbus

State: OH

Zip code of authorized person: 43207

Telephone number: (614) 492-8884

Ext.:

Fax number of authorized person: (614) 492-8894

Email address of authorized person: brad.scott@ecotoh.org

Name of authorized person's employer: Electronic Classroom of Tomorrow

Back

Exhibit D



Ms. Rivera,

ECOT is a non-traditional, virtual on-line school with 16,000-plus students. Classes are available anytime and anywhere to our students.

The response to your inquiry is at the end of each of the appropriate items and in blue type. Please do not hesitate to contact me with any issues or questions at 614.989.5399 or wgs003@gmail.com.

Included in our response is the following document:

Wireless Bid Analysis
ECOT Letter

Thank you for all your help,

Greg Spencer
614.989.5399
CRN 16062188

FY 2015 E-rate Application Information Request

8/20/2015

Contact Name: Greg Spencer
Applicant Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
FCC Form 471 Application Number(s): 1009681
Response Due Date: 9/4/2015

Dear Applicant:

As we discussed in our conversation, we are in the process of reviewing your Funding Year 2015 FCC Form 471 Applications for E-rate discounts. To complete our review, we need additional information, which is listed below.

Cost Effectiveness of Wireless Data Plans

Individual wireless data plans, air cards and mobile hotspots for mobile devices are ineligible for E-rate support unless a school or library seeking support for these services demonstrates that individual data plans are the most cost effective option for providing internal broadband access at schools and libraries or that installing a wireless local area network was not physically possible due to geographical or other limitations. If applicants fail to demonstrate either of these conditions, the funding request amount associated with the ineligible items must be removed.

During the review of your Funding Year 2015 FCC Form 471 application 1009681, we have determined that FRN 2791199 is a request for Data plans for mobile devices which are generally considered ineligible services. Ineligible services cannot receive E-rate funding.

For additional information on product and services eligibility requirements, see: Before You Begin Eligibility –
<http://www.usac.org/sl/applicants/beforeyoubegin/default.aspx>.

Question

#	Questions	Your Response
1	Are recipients of service under this FRN bookmobiles or library kiosks?	____ Yes <u>X</u> No
2	If yes, please provide supporting documentation that all recipients of service on this FRN are bookmobiles or library kiosks. Questions below no longer apply.	
3	Otherwise, please confirm that you agree this FRN can not be funded.	____ Yes ____ No
4	If Yes, no additional information is required for this issue.	
5	If No, please provide the rationale of how Data plans for mobile devices are the most cost effective solution for your entity(ies) with supporting documentation.	Option 1: ____ Option 2: <u>X</u>
a	Option I: A wireless local area network is impractical to install. Please demonstrate that you sought quotes for a wireless local area network solution and provide the analysis, responses from vendors and other supporting documentation to demonstrate that the installation of a wireless local area network is not practical.	
b	Option II: Data plans or air cards for mobile devices are the most cost effective solution for the entity(ies). If you claim that individual wireless data plans or air cards are more cost-effective solutions than installing a wireless local area network, please submit the following documentation: a. Please provide documentation to demonstrate that, during competitive bidding process for services requested in this FRN, you requested bids for both wireless local area networks as well as individual data plans connectivity solutions. b. Please provide competitive bidding documentation such as: i. Copies of bids and/or vendor quotes for individual wireless data plans and wireless local area network solutions. ii. If no bids were received, please provide a written confirmation of statements of no bids received for either solution. Additionally, please provide an explanation as to how your selection of the individual wireless data plan vendor was the most cost-effective solution.	This wireless Internet Access is utilized by staff at multiple statewide public testing sites. Ohio law requires students to be in a location monitored by a licensed educator for state tests. Because ECOT's students are located across the entire state of Ohio, these sites are temporary locations. ECOT does not have the authority to install any type of Internet Access in these locations. Wireless Internet Access is the only solution

	<p>iii. Vendor selection matrix and other documentation demonstrating that you have conducted a cost comparison of both a wireless local area network solution and individual wireless data plans solutions to demonstrate that the data plan solution is more cost effective. Note that schools with existing fixed broadband connections should limit this comparison to the recurring cost of their current broadband connection plus the added cost of any upgrades to their broadband connections and any additional or updated internal connections needed to deploy a sufficiently robust WLAN.</p> <p>c. Please specify the number of students and patrons served by individual wireless data plans, air cards or mobile hotspots services requested in this FRN.</p>	<p>available to us and is the most cost effective method for our staff to monitor, communicate, and report during testing sessions and student visits. (Please attached ECOT letter)</p> <p>The vendor selection matrix is attached.</p> <p>The total number of students served by this service is 16,046.</p>
6	<p>If you claim that services requested are eligible based on either Option #1 or Option #2, please answer the following question:</p> <p>Will E-rate service funded in this FRN be provided off campus?</p>	<p>_____ Yes <u> X </u> No</p> <p>Again, since ECOT is a virtual school, all locations are considered on-campus.</p>
a	<p>If Yes, please provide documentation identifying the charges associated with the ineligible use identified above. If the documentation does not specifically delineate the costs of the services, please provide information setting forth how the costs are allocated between eligible and ineligible use. Cost allocations must be based on tangible criteria and reach a realistic result.</p>	<p><input type="checkbox"/> Enclosed</p>
b	<p>If No, no further information is needed.</p>	

Please submit the necessary information within the 15 calendar day deadline of this request. Failure to respond may result in a reduction or denial of your funding request(s).

Response Reminders

Please email or fax the requested information to my attention. If you have any questions or you do not understand what we are requesting, please feel free to contact me.

It is important that we receive all of the information requested **within 15 calendar days** so we can complete our review of your application(s). **Failure to send all of the information requested may result in a reduction or denial of funding. If you need additional time to prepare your response, please let me know as soon as possible. If you are unable to provide the requested information because your**

school or library has closed for summer break, please indicate in writing the timeframe that you will be unavailable to respond.

Additionally, please note that you are required to retain all documents related to the application for, receipt and delivery of supported services as well as any other documents that demonstrate compliance with the requirements of the program for at least 10 years after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request.

Thank you for your cooperation and continued support of the Universal Service Program.

Sincerely,

Nancy Rivera
Associate Manager, Cost Effectiveness Review
USAC, Schools and Libraries Division
Phone: 973-581-5055
Fax: 973-599-6520
E-mail: nancy.rivera@sl.universalservice.org

September 4, 2015

Ms. Nancy Rivera
Associate Manager, Cost Effectiveness Review
USAC, Schools and Libraries Division

Ms. Rivera,

The Electronic Classroom of Tomorrow is a virtual school with more than 16,000 students across the entire state of Ohio. Student learning takes place "anytime, anywhere". Because of our unique structure, we utilize many facilities across the state for testing and counseling services. These facilities may change at a moment's notice, due to site availability and student enrollment. The State of Ohio mandates that locations for required testing be no more than 30 miles from a student's home and have a licensed proctor physically present, so it is not feasible to utilize the student homes or existing equipment for testing. It is not possible or economical for our school to install permanent or even temporary Internet Access in these diverse locations. The most cost effective and operationally sound method of providing Internet Access to these locations is the wireless data plans for mobile devices. ECOT included this service on its Form 470 bid and selected Verizon Wireless as our vendor on the Form 471.

Please let me know if you have any additional questions.

Sincerely,



Brad C. Scott
Director of IT
Electronic Classroom of Tomorrow

3/10/2015

ECOT FY2015 Cell/Internet Devices Bid Analysis

Cellular Phones Verizon

Price	5	40%
Relationship	5	20%
Transition	5	20%
Term	5	20%
Total Score	5	

Internet Devices Verizon

Price	5	40%
Relationship	5	20%
Transition	5	20%
Term	5	20%
Total Score	5	



Ms. Rivera,

As you know, ECOT is a non-traditional, virtual on-line school with 16,000-plus students. Classes are available anytime and anywhere to our students.

The response to your inquiry is at the end of each of the appropriate items and in bold, blue type. Please do not hesitate to contact me with any issues or questions at 614.989.5399 or wgs003@gmail.com.

Included in our response is the following document:

Letter of Authorization

Thank you for all your help,

Greg Spencer
614.989.5399
CRN 16062188

FY 2015 E-rate Application Information Request

12/9/2015

Contact Name: Greg Spencer
Applicant Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
FCC Form 471 Application Number(s): 1009681
Response Due Date: 12/24/2015

Dear Applicant:

The Cost Effectiveness Review (CER) team is in the process of reviewing your Funding Year 2015 FCC Form 471 Applications for E-rate discounts. To complete our review, we need additional information, which is listed below.

I. Issue

In response to the Information Request for FY2015 FCC Form 471 application #1009681, you indicated a consultant was not used however the documentation indicates the school is using a consultant. Please provide a copy of a signed and dated Consultant Agreement(s) or Letter of Agency.

Program procedures require that a consulting agreement or LOA authorizing a consultant to act on behalf of the applicant must be for Funding Year 2015. Failure to provide a consultant agreement, LOA or other proof of authorization for Funding Year 2015 will delay USAC's ability to issue a funding commitment decision letter for an indefinite period of time.

ECOT has contracted with WGS Consulting. Greg Spencer (CRN 16062188) is our consultant of record. Mr. Spencer is an E-Rate consultant and does not participate in any procurement processes, including vendor evaluations, for ECOT. Please see the Letter of Authority.

II. Issue

In response to the Information Request for FY2015 FCC Form 471 application #1009681, you did not provide the total number staff/teachers and classrooms/buildings for each entity. Please provide the following information for each entity:

Entity #	Entity Name	Total # of Staff & Teachers	# of Classrooms	# of Buildings
221005	ELECTRONIC CLASSROOM OF TOMORROW (ECOT)	350 staff	0	1
16064648	ELECTRONIC CLASSROOM OF TOMORROW - REC	4 staff 2 teachers	0	1
16084834	ECOT TESTING CENTER - DUBLIN	2 staff	0	1
16084835	ECOT TESTING CENTER - CLEVELAND	2 staff	0	1

III. Issue

In response to the Information Request for FY2015 FCC Form 471 application #1009681, you indicated FRN 2740682 from Time Warner Cable is a point to point circuit connecting the administrative office (entity #221005) to the data center. The Item 21 attachment for FRN 2742851 also indicates this is a point to point circuit to entity #221005. It appears these funding requests are providing duplicative services. Duplicative services are defined as services that deliver the same functionality to the same population in the same location during the same period of time. If the FRNs are duplicates, then one of the FRNs must be cancelled.

For additional information on duplicative services, see:

<http://www.usac.org/sl/applicants/beforeyoubegin/eligible-services-list.aspx>.

Question

To assist us in the review of your application, we need the following information:

#	Questions	Your Response
1	Are the funding requests mentioned above providing duplicative services?	<u> X </u> Yes <u> </u> No
a	If Yes , please send us written authorization to cancel or modify the FRN that is providing duplicative services. In your written reply, please specify which funding requests you wish to cancel or modify to remove the duplicate FRN Line Item(s) listed above.	<u> X </u> Enclosed We wish to cancel FRN 2742851. It was replaced by FRN 2740682 for Funding Year 2015.
b	If No , Please provide third-party documentation verifying that the requests	<input type="checkbox"/> Enclosed

	<p>are not duplicates. Examples of documentation verifying that the applications are not duplicates are bills or signed copies of contracts verifying different services being delivered, applicant's statement in writing that FRNs are for different locations or other detailed information specifying the recipients of service and/or types of services being provided.</p> <p>Additionally, please provide a written explanation as to why these FRNs are not duplicates.</p>	
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Please submit the necessary information within the 15 calendar day deadline of this request. Failure to respond may result in a reduction or denial of your funding request(s).

IV. Issue

Based on the review of your Funding Year 2015 FCC Form 471 application 1009681, the documentation provided for FRN 2840474 indicates the 3 Gbps aggregated circuit is provided by 6 different carriers. The average utilization of the circuit is currently 1.5 Gbps with the additional 1.5 Gbps allocated for growth and peak utilization above the average. The peak utilization is estimated to be an additional 900 Mbps.

Question

To assist us in the review of your application, we need the following information:

1. Please provide the names of the 6 carriers providing the service.

Easton Telcom is ECOT's single E-Rate certified service provider for FRN 2840474. Easton has access to multiple carriers and utilizes those carriers to provide the most efficient services to their customers. ECOT has contracted for the aggregated circuit, not necessarily any specific carriers. Please note the Easton service is unique as it is aggregated onsite as opposed to being piped in pre-aggregated offsite. This process guarantees a higher quality of service which is required for our educational process to function. There are eight carriers utilized by Easton for our services and they are listed below:

**AT&T
Level 3
TW Telecom (network merging with L3)
Time Warner Cable
XO
Hurricane Electric
Tata
US Signal**

While the carrier diversity of pathways into the data center is beneficial, Easton's multiple carriers also serve us from a quality of service standpoint. As an online school with students in all 88 counties in Ohio, students will be accessing their "classroom" from a number of different Internet providers with diversely back end connected service. Utilizing multiple carriers through Easton for our internet circuit ensures the best quality network path, regardless of the Internet provider our students are connecting through to access their educational content.

2. The documentation indicates the aggregated circuit has multiple diverse pathways into the datacenter which minimizes risk and optimizes performance. Could the bandwidth requirements have been met by a single provider? X Yes No
- If **Yes**, please explain why a single carrier solution was not selected if a single carrier was able to meet the bandwidth requirements.
 - If **No**, please explain the limitations present which prevent a single carrier from providing the service.

Our bandwidth requirements have been met by a single provider, Easton Telcom SPIN 143003988. Easton Telcom utilizes multiple carriers to provide their services.

3. The average usage of the circuit combined with the peak utilization totals 2.4 Gbps. Is the additional 600 Mbps circuit capacity allocated only to future growth?
 Yes X No
- If **No**, please explain what the additional 600 Mbps capacity is used for.

The additional bandwidth is for current growth. ECOT's bandwidth usage continues to grow throughout each school year as the student enrollment grows and the electronic curriculum is utilized. This has been the case every year of ECOT's existence. Usage increases during the school year due to the increased usage of the electronic curriculum. More students accessing the Internet/network/electronic curriculum requires more bandwidth. Students are accessing file types that are larger in nature which require more bandwidth, as well. As an electronic school, this capacity is essential for our students' learning.

4. The documentation indicates that the students in ECOT's environment do all their work via the Internet and all of that traffic passes through ECOT's network. Where are the students located while accessing ECOT's network for the services requested on FRN 2840474?

The students can be located anywhere they have Internet Access. All ECOT educational curriculum is delivered via the Internet.

V. Issue

Based on the review of your Funding Year 2015 FCC Form 471 application 1009681, we have determined that your request includes services to the following entity(ies). However, these entities are not listed in your FCC Form 471 application.

Entity Name
ECOT
535 Scherers Court, Worthington, OH 43085

Entities may be added to the application only if the applicant can demonstrate that the entities were omitted as a result of a Ministerial or Clerical error.

According to FCC Order (FCC 11-60), ministerial and clerical errors are defined as follows: "The applicant can amend its forms to correct clerical and ministerial errors on their FCC Forms 470, FCC Form 471 applications, or associated documentation until an FCDL is issued. Such errors

include only the kinds of errors that a typist might make when entering data from one list to another, such as mistyping a number, using the wrong name or phone number, failing to enter an item from the source list onto the application, or making an arithmetic error.” Additional correctable errors can be found in the FCC’s Order DA-2354.

Questions

To assist us in the review of your application, we need the following information on school or library letterhead signed by a school or library official. If responding via email, please provide the name and title of the school or library official providing the response.

This response has been provided by Mr. Brad C. Scott, Director of IT at ECOT.

As a virtual school, we largely exist online. We have an administrative office and a few testing facilities. When our students "go to school", it is through logging in to the Internet via their computer. Providing the best possible access to the electronic curriculum via Internet circuits is critical to our students’ success.

An aggregated Internet circuit does more than an active/passive failover which may be a point of confusion. Data can be traversing each of the carriers aggregated simultaneously as we are paying for a total of 3GB of bandwidth. The technology in the Easton service operates in a way that allows each packet being sent from a user to come through different providers to make up the total data transferred with the fastest transfer speed utilizing Open Shortest Path First (OSPF) Internet Protocol.

Congestion on a single provider’s network from a large transfer in the route path between a user and a server can cause a timeout and a "page cannot be displayed" error. In a traditional classroom, the teacher can direct the students to something else, but for ECOT, that can cause the classroom to cease to exist at all. The Easton service makes those “traffic” decisions dynamically.

The Scherers location is not an ECOT facility and, therefore, ECOT did not request a Billed Entity Number. In the technology industry, the Scherers location is known as a co-location facility. We are not seeking E-Rate funding for the site itself or the service of hosting our equipment. The Scherers location serves as the virtual front door to ECOT’s classroom. We do not have access to the bandwidth or power necessary to operate a high availability operation at the ECOT administrative office located at 3700 South High Street. It is necessary to contract for this service which is essential for ECOT to provide the classroom experience to its students. The Scherers co-location facility and Easton’s dynamic carrier load balancing service is the best, most cost effective solution for ECOT’s students.

1. Were the entities listed above omitted from your FCC Form 471 application due to a Ministerial and Clerical (M&C) error? ____ Yes __ **X** __ No
 - If **No**, no further information is needed.
 - If **Yes**, do you wish to correct the “Discount Calculation” worksheet and add this

entity(ies) to your FCC Form 471 application? ____Yes ____ No

- a. If **No**, these entities will not be added to the FCC Form 471. Are there costs associated with these entities in your funding request(s)? If so, please provide the dollar amounts for the applicable funding request(s).
- b. If **Yes**, please provide a copy of the source documentation used to prepare your FCC Form 471 application which shows that the entity(ties) to be added are actually receiving service and the dollars associated (if applicable). Examples of supporting documentation are contracts, vendor quotes, vendor bills, invoices, etc.

In addition to the source documentation, your response must include:

1. The Entity Name and associated Entity Number.
Note: If you do not have an entity number, please call the Client Service Bureau at 888-203-8100.
2. Discount information (e.g. total student enrollment and number of students eligible for participation in the National School Lunch Program or NSLP).
3. The Rural/Urban status of the entity.
4. A list of all the FRNs that will be providing services to these entities.
5. State whether the dollars associated with the entity(ies) have already been included in the FRNs or provide the dollars associated with the entity(ies) per FRN.

Be advised that the addition of this entity(ies) may increase or decrease your discount, which could impact your funding.

Please submit the necessary information within the 15 calendar day deadline of this request. Failure to respond may result in a reduction or denial of your funding request(s).

VI. Issue

Based on the documentation that you have provided during the review of your Funding Year 2015 FCC Form 471 1009681, we have determined that FRN 2791240 includes ineligible items. This is a violation of the Program rules and therefore, the funding request amount associated with the ineligible items must be removed.

For further information, see "Cost Allocation Guidelines for Products and Services" located in the Reference Area of the SLD Web site at:

<http://www.usac.org/sl/applicants/beforeyoubegin/eligible-services/cost-allocations.aspx>.

Listed below are the ineligible items and their associated costs:

Ineligible Services	Associated Cost
DIDs	\$62.40 per month

Question

#	Questions	Your Response
1	Please confirm if you agree with the cost allocation.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2	If Yes , no additional information is required for this issue.	
3	<p>If No, please select one of the options below.</p> <p>Option I: Alternative Cost Allocation If you disagree with the cost allocation outlined above, an alternative cost allocation method or formula which provides the specific cost(s) for the ineligible items is needed. To do so, provide an explanation of the costs associated with these ineligible items and provide documentation, such as bills, to support your answer. All cost-allocations must be based on tangible criteria and reach a realistic result.</p> <p>Option II: Products and Services Eligibility If you disagree with our eligibility determination of your items, please provide third party documentation which demonstrates that the products and services are eligible for E-rate funding.</p> <p>Option III: Splitting the FRN If you disagree with the two options mentioned above, you can remove the funding request amount associated with the ineligible items from the above-referenced FRN. This funding request amount will then be placed on a new FRN (we refer to this process as "splitting an FRN").</p>	<p>Option 1: _____</p> <p>Option 2: _____</p> <p>Option 3: _____</p>

Would you like to split the above-referenced FRN? ☐ Yes ☒ No

Providing Information for the New FRN

In order to assist us in creating the new FRN that will be used to remove the funding request amount associated with the ineligible items, you must provide us with the information for the new FRN.

You can "split" the FRN by:

- Modifying the current FRN information found in Block 5: Discount Funding Request(s) of your FCC Form 471 by reducing it in order to remove the cost associated with the ineligible items.
- Providing the Block 5: Discount Funding Request(s) information for the original FRN (pre and post-split FRN). The post-split FRN will be a request for the amount of the original FRN with the ineligible cost removed.
- Completing Block 5: Discount Funding Request(s) for the new FRN using the blank Block 5: Discount Funding Request(s) form attached to this letter. The new FRN will be a request for the cost associated with the ineligible items. This FRN will then be denied because it represents the cost associated with the ineligible items.

For additional guidance on filling out your Block 5: Discount Funding Request(s), please refer to the FCC Form 471 filing instructions at <http://www.usac.org/sl/tools/forms/default.aspx>.

Please submit the necessary information within the 15 calendar day deadline of this request. Failure to respond may result in the denial or reduction of your funding request(s).

VII. Issue

We noticed that the Funding Year 2015 FRNs filed for the ELECTRONIC CLASSROOM OF TOMORROW (ECOT) (#221005) may include requests for off-premise services based on your supporting documentation which indicates teachers, students, and other departments who are working from home have telephone extensions that families can call to speak with the teachers directly.

Question

To assist us in the review of your application, we need the following information:

1. Did you include requests for any off-premise services in the following FRNs?

FCC Form 471	FRN	Yes	No
FCC Form 471 application 1009681	FRN 2791240:		X
FCC Form 471 application 1009681	FRN 2791779:		X
FCC Form 471 application 1009681	FRN 2791128:		X
FCC Form 471 application 1009681	FRN 2791160:		X

If Yes:

- Please provide the FCC Form 471 Application # and FRN # along with a cost allocation for the off-premise service. Any cost allocation provided for the FRN(s) outlined above should include a reasonable explanation and supporting documentation explaining how you arrived at this cost allocation. If your supporting documentation does not specifically delineate between the costs of the eligible on campus usage and ineligible off campus usage, please provide information setting forth how these costs were allocated. Such a cost allocation must be based on tangible criteria and reach a realistic result.

If No:

- Please provide an explanation as to why your supporting documentation indicates teachers, students, and other departments who are working from home have telephone extensions that families can call to speak with the teachers directly.

The telephones/extensions referenced in our response are located at ECOT Offices, not in the homes of students or teachers. ECOT has not requested any E-Rate funding for any remote services located in homes of students, teachers, or staff. Windstream and Easton provide telephone services for ECOT facilities only. As an electronic school, ECOT must provide telephone facilities at our location for students and teachers to communicate.

The statement below was our response to the previous inquiry which includes FRNs 2791240, 2791779, 2791128, and 2791160, respectively.

“Because students and teachers are working from home, voice communication is as important a communication medium as other digital communication. Through phones connected into headquarters, each teacher has an extension the ECOT’s families can call to speak to a teacher directly, and other departments interact with the families similarly. The PRI circuits identified also support communication with ECOT’s general information and support call center, counseling department, truancy department, technical helpdesk, principals, testing department, and various personnel supporting the student experience.”

Please submit the necessary information within the 15 calendar day deadline of this request. Failure to respond may result in a reduction or denial of your funding request(s).

Response Reminders

Please email or fax the requested information to my attention. If you have any questions or you do not understand what we are requesting, please feel free to contact me.

It is important that we receive all of the information requested **within 15 calendar days** so we can complete our review of your application(s). **Failure to send all of the information requested may result in a reduction or denial of funding. If you need additional time to prepare your response, please let me know as soon as possible.**

Additionally, please note that you are required to retain all documents related to the application for, receipt and delivery of supported services as well as any other documents that demonstrate compliance with the requirements of the program for at least 10 years after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request.

Thank you for your cooperation and continued support of the Universal Service Program.

Sincerely,

Nancy Rivera
Associate Manager, Cost Effectiveness Review
USAC, Schools and Libraries Division
Phone: 973-581-5055
Fax: 973-599-6520
E-mail: nancy.rivera@sl.universalservice.org

July 1, 2015

To Whom It May Concern:

Subject: Letter of Agency

This Letter of Authority authorizes Greg Spencer, Consultant Registration Number 16062188, to act on behalf of the Electronic Classroom of Tomorrow (BEN 221005) of Columbus, Ohio on all E-Rate matters.

Sincerely,



Brad C. Scott
Director of IT

Cc: Greg Spencer



Ms. Rivera,

The response to your inquiry is at the end of each of the appropriate items and in bold, blue type. Please do not hesitate to contact me with any issues or questions at 614.989.5399 or wgs003@gmail.com.

Thank you for all your help,

Greg Spencer
614.989.5399
CRN 16062188

FY 2015 E-rate Application Information Request

2/18/2016

Contact Name: Greg Spencer
Applicant Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
FCC Form 471 Application Number(s): 1009681

Dear Applicant:

The Cost Effectiveness Review (CER) team is in the process of reviewing your Funding Year 2015 FCC Form 471 Applications for E-rate discounts to ensure that they are in compliance with the rules of the Universal Service Program.

I. Issue

We have completed our review of your Funding Year 2015 FCC Form 471 application 1009681 and determined that FRN 2840474 will be denied because the request is for products and services to ineligible entities. Ineligible entities cannot receive E-rate funding. This is a violation of the Program rules and therefore, the funding request will be denied.

For additional information on entity eligibility requirements, see: Before You Begin Eligibility – <http://www.usac.org/sl/applicants/beforeyoubegin/default.aspx>.

Listed below are the ineligible entities or locations:

Entity Name
ECOT at 535 Scherers Court, Worthington, OH 43085

If you do not agree with the review decision

If the entire FRN should not be denied and you have alternative information to support your position, please provide the supporting documentation.

If you fail to respond to this email within 7 days, we will perform the action(s) listed above.

The 3 Gb service is at the Scherers co-location and acts as the “front door” to our electronic school for more than 16,000 students throughout Ohio. Unlike a traditional brick and mortar school where students file into the building one by one, the “front door” of ECOT must be robust enough to allow 16,000 students through our virtual door simultaneously. Our entire educational curriculum is delivered to the students through our co-location facility. The students use their personal Internet connections to access our “front door” through the 3 Gb service in the co-location housing our data center.

This service is essential to provide the educational curriculum for our students’ consumption.

II. *Issue*

We have completed our review of your Funding Year 2015 FCC Form 471 application 1009681 and have determined that FRN 2840474 includes ineligible items and therefore, will be denied.

Listed below are the ineligible items:

Ineligible Services
Services for a cyber-school entity utilized by students while located off-premise

If you do not agree with the review decision

If you disagree with our determination and you have alternative information, please provide third party documentation to support your position (e.g. vendor bill, contract, service agreement, etc.).

If you fail to respond to this email within 7 days, we will perform the action(s) listed above.

As stated in previous responses, the charter from the state of Ohio under which ECOT must operate does not allow students to receive educational instruction at ECOT’s facilities. As such, the state defines a student’s school site as where they are accessing the school virtually, which in most situations, is from their home.

ECOT is not requesting funding for remote connectivity in households which connects students to the school. ECOT is requesting funding for the circuit ECOT utilizes for core communications that “creates” the school virtually which the students attend.

ECOT spends approximately \$4.2 million on the remote Internet Access at students’ homes needed to “go to school”. Program rules define these expenditures as ineligible for funding and, accordingly, ECOT does not apply for these expenditures. There are two pieces to Internet Access for cyberschools— the virtual school location at Scherers and the students’ remote location for learning. The total cost of Internet Access for this endeavor is approximately \$4.92 million.

III. Issue

We have completed our review of your Funding Year 2015 FCC Form 471 application 1009681 and determined that FRN 2840474 will be denied because your request has not been justified as cost effective as required by FCC rules.

FRN 2840474 is denied for the following reasons:

This request is for Internet Access at a cost of \$722,124.00 which, for a school that does not have any students located on site, is excessive and not cost effective.

If the FRN(s) should not be denied and you have alternative information to support your position, please provide the supporting documentation. Please keep in mind that your supporting documentation should be the documentation or data used to prepare your FCC Form 471 application.

For additional guidance on determining eligible services, please refer to the USAC website at: <http://www.usac.org/sl/applicants/beforeyoubegin/eligible-services-list.aspx>.

If you fail to respond to this email within 7 days, we will perform the action(s) listed above.

As stated in previous responses, the annual student population growth requires a circuit with a large capacity, in this case 3.0 Gb, in order to provide the curriculum to in excess of 16,000 students statewide. The expenditure for this service is more cost effective by leveraging the co-location facility rather than building a data center at ECOT's administrative offices. The connection also provides a significant security level for our students.

Response Reminders

Please email or fax any information that you wish to provide to my attention. If you have any questions or you do not understand what we are requesting, please feel free to contact me.

Thank you for your cooperation and continued support of the Universal Service Program.

Sincerely,

Nancy Rivera
Associate Case Manager, Cost Effectiveness Review
USAC, Schools and Libraries Division
Phone: 973-581-5055
Fax: 973-599-6520
E-mail: nancy.rivera@sl.universalservice.org

Exhibit E

ECOT Testing Facility Site List - ALL

TestSiteID	SiteCode	SiteName	Address	ddlPostalCode
1	ADA-LIB	Ada Public Library	329 North Main St	Adena, OH 43901 (Jefferson)
2	SPECIAL	Special Testing Arrangement	c/o ECOT Testing	Columbus, OH 43207 (Franklin)
3	ALLIANCE-Y	Alliance YMCA	201 South Union St	Alliance, OH 44601 (Stark)
4	ASHLAND-LIB	Ashland Co Public Library	224 Claremont Ave	Ashland, OH 44805 (Ashland)
5	SPECIAL-ECOT	ECOT - Main Office	3700 S. High St	Columbus, OH 43207 (Franklin)
6	ALC-SITE	ALC Organization Site	c/o Steve Sellers	Columbus, OH 43207 (Franklin)
7	ATHENS-COOP	Athens County Co-Op Extension	280 W Union St	Athens, OH 45701 (Athens)
8	AVLAKE-LEG	American Legion Post 211	31972 Walker Road	Avon Lake, OH 44012 (Lorain)
9	BATAVIA-LIB	Clermont Co Public Library	180 South 3rd St	Batavia, OH 45103 (Clermont)
10	BELLEFONT-Y	Bellefontaine/Hilliker YMCA	300 Sloan Blvd	Bellefontaine, OH 43311 (Logan)
11	BEREA-LEGION	American Legion Post 91	91 American Legion Pkwy	Berea, OH 44017 (Cuyahoga)
12	BLANCHEST-LIB	Blanchester Public Library	110 N. Broadway	Blanchester, OH 45107 (Clinton)
13	BOWLINGGR-LIB	Wood Co Public Library	251 N Main St	Bowling Green, OH 43402 (Wood)
14	BUCYRUS-LEG	American Legion Post 181	123 East Rensselaer St.	Bucyrus, OH 44820 (Crawford)
15	CAMBRIDGE-REC	Guernsey County Rec Center	1101 McFarland Dr	Cambridge, OH 43725 (Guernsey)
16	CHARDON-Y	Geauga Co YMCA Branch	12460 Bass Lake Road	Chardon, OH 44024 (Geauga)
17	CHILLI-ODM	Open Door Ministries	3130 S. Bridge St	Chillicothe, OH 45601 (Ross)
18	GEORGETOWN-LIB	Brown County Library - Georgetown	200 W Grant Ave	Georgetown, OH 45121 (Brown)
19	CINCY-MLIB	Monfort Heights Public Library	3825 West Fork Rd	Cincinnati, OH 45247 (Hamilton)
20	NORWOOD-LIB	Norwood Public Library	4325 Montgomery Rd	Cincinnati, OH 45212 (Hamilton)
21	CINCY-POST484	American Legion Post 484	1837 Sutton Ave	Cincinnati, OH 45230 (Hamilton)
22	CINCY-POST513	American Legion Post 513	7947 Hamilton Ave	Cincinnati, OH 45231 (Hamilton)
23	CINCY-Y	Melrose Branch YMCA	2840 Melrose Ave	Cincinnati, OH 45206 (Hamilton)
24	COLS-ALLSAINTS	All Saints Lutheran Church	6770 North High Street	Columbus, OH 43085 (Franklin)
25	COLS-BIGRUNPOL	Police Community Station in Big Run	4215 Clime Road	Columbus, OH 43228 (Franklin)
26	COLS-EASTCHURCH	Vineyard Christian Church-Columbus	1055 McNaughten Rd	Columbus, OH 43213 (Franklin)
27	COLS-GCLEGION	American Legion Post 164	3363 McDowell Rd	Grove City, OH 43123 (Franklin)
28	COLS-JASH	J. Ashburn Youth Center	85 Clarendon	Columbus, OH 43223 (Franklin)
29	COLS-LIGHTHOUSE	Lighthouse Ministries-Columbus	2295 S. High St	Columbus, OH 43207 (Franklin)
30	COLS-LINDEN	Linden Branch Library	2223 Cleveland Ave	Columbus, OH 43211 (Franklin)
31	COLS-YMCA	Gahanna Branch YMCA	555 YMCA Place	Gahanna, OH 43230 (Franklin)
32	COLUMBIA-LEGION	American Legion Post 290	44403 State Route 14	Columbiana, OH 44408 (Columbiana)
33	DAYTON-ECOT	ECOT Dayton	1133 S Edwin C Moses Blvd	Dayton, OH 45417 (Montgomery)
34	DEFIANCE-Y	Defiance YMCA	1599 Palmer Dr	Defiance, OH 43512 (Defiance)
35	DELAWARE-COBLDG	Delaware County Building	101 North Sandusky St	Delaware, OH 43015 (Delaware)
36	ELIVER-LEGION	American Legion Post 736	46000 Y and O Rd	East Liverpool, OH 43920 (Columbiana)
37	EUCLID-LEGION	American Legion Post 343	20750 Arbor Ave	Cleveland, OH 44123 (Cuyahoga)
38	FOSTORIA-LIB	Kaubisch Memorial Library	205 Perry St	Fostoria, OH 44830 (Hancock)
39	FREDERICK-LIB	Fredericktown Community Library	1 Burgett Drive	Fredericktown, OH 43019 (Knox)
40	FREMONT-LEGION	American Legion Post 121	2000 Buckland Ave	Fremont, OH 43420 (Sandusky)
41	GENOA-LIB	Genoa Public Library	602 West St	Genoa, OH 43430 (Ottawa)
42	WESTERVILLE-CHURCH	The Vineyard Church	6000 Cooper Rd	Westerville, OH 43081 (Franklin)
43	GREENVLL-LEGION	American Legion Post 140	325 N. Ohio St	Greenville, OH 45331 (Darke)
44	HAMILTON-WILKS	Harry T. Wilks Conference Center	1601 University Blvd	Hamilton, OH 45011 (Butler)
45	HARRISON-CHURCH	Legacy Christian Church-Harrison	216 North Sycamore St	Harrison, OH 45030 (Hamilton)
46	JACK-CHURCH	Christ United Methodist Church-Jackson	150 Portsmouth St	Jackson, OH 45640 (Jackson)
47	LANCASTER-ASC	West After School Center	625 Garfield Ave	Lancaster, OH 43130 (Fairfield)
48	LEBANON-CHURCH	Lebanon United Methodist Church	122 East Silver Street	Lebanon, OH 45036 (Warren)
49	LIMA-KNIGHTS	Knights of Columbus Family Center	810 S. Cable Rd	Lima, OH 45805 (Allen)
50	LOGAN-LIB	Logan Hocking Library	230 East Main Street	Logan, OH 43138 (Hocking)
51	COSH-LIB	Coshocton Public Library	655 Main St.	Coshocton, OH 43812 (Coshocton)
52	MARION-LEGION	American Legion Post 584	142 Olney Ave	Marion, OH 43302 (Marion)
53	MARTINSFERRY-LIB	Martins Ferry Public Library	20 James Wright Place	Martins Ferry, OH 43935 (Belmont)
54	MEDINA-REC	Medina Community Rec Center	855 Weymouth Road	Medina, OH 44256 (Medina)
55	MENTOR-COMCENT	Mentor Community Center	8600 Munson Rd	Mentor, OH 44060 (Lake)
56	MIDDLETOWN-LIB	Middletown Public Library	125 South Broad St	Middletown, OH 45044 (Butler)
57	MTORAB-LIB	Brown Co Public Library - Mt Orab	613 S. High St	Mount Orab, OH 45154 (Brown)
58	MTSTERL-CHURCH	First United Methodist Church	110 S. London St.	Mount Sterling, OH 43143 (Madison)
59	NEWARK-LIB	Newark Public Library	101 W Main St	Newark, OH 43055 (Licking)
60	NEWPHILLY-LIB	Tuscarawas Co Public Library	121 Fair Ave NW	New Philadelphia, OH 44663 (Tuscarawas)
61	NORWALK-COMCENT	Ernsthausen Community Complex	100 Republic St	Norwalk, OH 44857 (Huron)
62	OREGON-SHUER	JJ Shuer Building Challenger Center	4955 Seaman St	Oregon, OH 43616 (Lucas)
63	ORWELL-LIB	Grand Valley Public Library-Orwell	1 North School St	Orwell, OH 44076 (Ashtabula)
64	OWENS-FAIR	Clermont Co Fairgrounds	1000 Locust St	Owensville, OH 45160 (Clermont)
65	PARMA-CHURCH	Calvary Lutheran Church-Parma	6906 W. Pleasant Valley Rd	Parma, OH 44129 (Cuyahoga)
66	RACINE-LEGION	American Legion Post 602	1 Sixth Street	Racine, OH 45771 (Meigs)
67	SANDUSKY-LIB	Sandusky Library	114 W. Adams St	Sandusky, OH 44870 (Erie)
68	SIDNEY-YMCA	Sidney Shelby County YMCA	300 E. Parkwood St	Sidney, OH 45365 (Shelby)
69	SPRINGFIELD-EXPO	Midwest Expo Center	4122 Layborne Rd	Springfield, OH 45505 (Clark)
70	GOSHEN-LIB	Goshen Public Library	6678 State Route 132	Goshen, OH 45122 (Clermont)
71	STPARIS-LIB	St. Paris Library	127 East Main St	Saint Paris, OH 43072 (Champaign)
72	SYLVANIA-LEGION	American Legion Post 468	5580 Centennial Rd	Sylvania, OH 43560 (Lucas)
73	TALLMADGE-CHURCH	Tallmadge First Church of God	464 Northeast Ave	Tallmadge, OH 44278 (Summit)
74	TOLEDO-CHURCH	Southgate Church Berean	1217 Prouty Ave	Toledo, OH 43609 (Lucas)
75	TROY-LIB	Troy-Miami Co Library	419 W Main St	Troy, OH 45373 (Miami)
76	URBANA-LIB	Champaign County Library	1060 Scioto St	Urbana, OH 43078 (Champaign)
77	WAVERLY-LIB	Waverly Public Library	207 N Market St	Waverly, OH 45690 (Pike)
78	WELLING-LEGION	American Legion Post 8	518 S. Main St	Wellington, OH 44090 (Lorain)
79	WESTUNION-OFFICE	West Union Family Center	923 Sunrise Ave	West Union, OH 45693 (Adams)
80	WILLARD-LEGION	American Legion Post 514	3096 State Route 99S	Willard, OH 44890 (Huron)
81	WILLOUGHBY-LIB	Willoughby Public Library	30 Public Square	Willoughby, OH 44094 (Lake)
82	WOOSTER-ARTS	Wayne Center for the Arts-Wooster	237 S. Walnut St	Wooster, OH 44691 (Wayne)
83	EATON-YMCA	Preble County YMCA	450 Washington-Jackson Rd	Eaton, OH 45320 (Preble)
84	HILLS-CHURCH	First United Methodist Church	133 East Walnut Street	Hillsboro, OH 45133 (Highland)
85	CLEVE-TRINITY	Trinity Cathedral Commons	2230 Euclid Ave.	Cleveland, OH 44115 (Cuyahoga)
86	AMHERST-CHURCH	Faith Baptist Church-Amherst	440 North Lake St.	Amherst, OH 44001 (Lorain)

ECOT Testing Facility Site List - ALL

TestSiteID	SiteCode	SiteName	Address	ddlPostalCode
87	XENIA-LIB	Xenia Public Library	76 E. Market St	Xenia, OH 45385 (Greene)
88	OAKHILL-LIB	Oak Hill Library	226 S Front Street	Oak Hill, OH 45656 (Jackson)
89	AKRON-CHURCH	Bath United Church of Christ	3980 W Bath Rd.	Akron, OH 44333 (Summit)
90	BELPRE-LIB	Belpre Library	2012 Washington Blvd.	Belpre, OH 45714 (Washington)
91	COLLEGE-STEUB	Jefferson Community College	4000 Sunset Blvd	Steubenville, OH 43952 (Jefferson)
92	MANSF-CHURCH	Diamond Hills Baptist Church-Mansfield	647 S. Diamond St.	Mansfield, OH 44907 (Richland)
93	PAULDING-LIB	Paulding County Carnegie Library	205 South Main Street	Paulding, OH 45879 (Paulding)
94	LIVINGSTON-LIB	Livingston Branch Library	3434 Livingston Ave	Columbus, OH 43227 (Franklin)
95	STREETSBORO-LIB	Portage County District Library	8990 Kirby Lane	Streetsboro, OH 44241 (Portage)
96	DAYTONEAST-LIB	East Branch Library	2008 Wyoming St	Dayton, OH 45410 (Montgomery)
97	WARREN-INN	The Avalon Inn	9519 East Market St.	Warren, OH 44484 (Trumbull)
98	ZANES-LEGION	American Legion Post 29	27 South 3rd St	Zanesville, OH 43701 (Muskingum)
99	PORTS-CHURCH	Christ's Community Church	25th & Thomas St	Portsmouth, OH 45662 (Scioto)
100	NEWLEX-CENTER	New Lexington Community Center	600 Senior Center Drive	New Lexington, OH 43764 (Perry)
101	COLS-WCHURCH	Columbia Hts United Methodist Church-Galloway	775 Galloway Rd	Galloway, OH 43119 (Franklin)
102	TROTWOOD-CHURCH	Maranatha Christian Fellowship Church	4501 Wolf Road	Dayton, OH 45416 (Montgomery)
103	CORTLAND-GARDEN	Garden Brook Banquet Center	4820 State Route 5	Cortland, OH 44410 (Trumbull)
104	PAINSVLE-LIB	Morley Library	184 Phelps Street	Painesville, OH 44077 (Lake)
105	YOUNGS-YMCA	Youngstown YMCA	17 North Champion St	Youngstown, OH 44503 (Mahoning)
106	SHAWNEE-UNIV	Shawnee State University	940 Second St	Portsmouth, OH 45662 (Scioto)
107	MARYBAB-LIB	Mary E Babcock Library	320 N Main St	Johnstown, OH 43031 (Licking)
108	GALLIA-LIB	Bossard Public Library	7 Spruce St	Gallipolis, OH 45631 (Gallia)
109	WILLIAMS-LIB	Williams County Library - West Annex	107 E. High St	Bryan, OH 43506 (Williams)
110	MANSF2-CHURCH	Church of God of Prophecy	1080 West Longview Ave	Mansfield, OH 44906 (Richland)
111	ELYRIA-CHURCH	St. John Lutheran Church	1140 W. River Rd N.	Elyria, OH 44035 (Lorain)
112	CIRCLE-CHURCH	Community United Methodist Church-Circleville	120 N Pickaway St	Circleville, OH 43113 (Pickaway)
113	EATON-LIB	Eaton Public Library Resource Center	450 South Barron St	Eaton, OH 45320 (Preble)
114	MAUMEE-LIB	Maumee Public Library	501 River Road	Maumee, OH 43537 (Lucas)
115	NEWARK-CHURCH	Newark Church of the Nazarene	200 S. Williams St	Newark, OH 43055 (Licking)
116	WASHINGTON-LIB	Washington County Public Library	615 5th Street	Marietta, OH 45750 (Washington)
117	BROOKLYN-LIB	Brooklyn Branch Library	4480 Ridge Rd	Brooklyn, OH 44144 (Cuyahoga)
118	NEWLEX-CHURCH	Grace Community Church of the Nazarene	7945 Tunnel Hill Rd	New Lexington, OH 43764 (Perry)
119	COVEDALE-LIB	Covedale Branch Library	4980 Glenway Ave	Cincinnati, OH 45238 (Hamilton)
120	EUCLID-CHURCH	Euclid Lutheran Church	431 E 260th St	Euclid, OH 44132 (Cuyahoga)
121	HILLSBORO-CHURCH	First Presbyterian Church-Hillsboro	201 E Main St	Hillsboro, OH 45133 (Highland)
122	FREMONT-YMCA	Fremont Branch YMCA	1000 North St	Fremont, OH 43420 (Sandusky)
123	HUBER-YMCA	Huber Heights YMCA	7251 Shull Rd	Huber Heights, OH 45424 (Montgomery)
124	PIQUA-CENTER	Piqua Youth Center	223 West High St	Piqua, OH 45356 (Miami)
125	POMEROY-LIB	Pomeroy Public Library	216 W. Main St	Pomeroy, OH 45769 (Meigs)
126	BARBERTON-CHURCH	Prince of Peace Parish-Barberton	1263 Shannon Ave	Barberton, OH 44203 (Summit)
127	RAVENNA-LIB	Reed Memorial Library	167 East Main St	Ravenna, OH 44266 (Portage)
128	ASHTABULA-CHURCH	Zion Lutheran Church-Ashtabula	2310 West 9th St	Ashtabula, OH 44004 (Ashtabula)
129	SPRINGFIELD-MARRIOTT	Courtyard by Marriott	100 South Fountain Ave	Springfield, OH 45502 (Clark)
130	WJEFF-LIB	Hurt/Battelle Memorial Library	270 Lilly Chapel Rd	West Jefferson, OH 43162 (Madison)
131	KETTERING-REC	Kettering Recreation Complex	2900 Glengarry Dr	Kettering, OH 45420 (Montgomery)
132	OXFORD-UNIV	Miami University-Shriver Center	701 East Spring St	Oxford, OH 45056 (Butler)
133	LEBANON-CHURCH2	Resurrection Lutheran Church-Lebanon	1270 N Broadway St	Lebanon, OH 45036 (Warren)
134	TIFFIN-CENTER	St. Francis Spirituality Center	200 St. Francis Ave	Tiffin, OH 44883 (Seneca)
135	UNIONTOWN-CHAPEL	The Chapel-Green Campus	1800 Raber Rd	Uniontown, OH 44685 (Stark)
136	WADSWORTH-LIB	Wadsworth Public Library	132 Broad St	Wadsworth, OH 44281 (Medina)
137	MID-ARTS	Middletown Arts Center	130 N Verity Pkwy	Middletown, OH 45042 (Butler)
138	EUCLID-LIBRARY	Euclid Public Library	631 East 222nd St	Euclid, OH 44123 (Cuyahoga)
139	BETHEL-LEGION	American Legion Post 406	3393 Legion Lane	Bethel, OH 45106 (Clermont)
140	LINDEN-POLICE	Linden Police Station	1371 Cleveland Ave	Columbus, OH 43211 (Franklin)
141	MT VERNON-CHURCH	First Christian Church Disciples of Christ	110 E Vine St	Mount Vernon, OH 43050 (Knox)
142	RAVENNA-CHURCH	First Christian Church-Ravenna	420 S Prospect St	Ravenna, OH 44266 (Portage)
143	HAMPTON-CLEVELAND	Hampton Inn - Cleveland Hopkins	10305 Cascade Crossing	Brooklyn, OH 44144 (Cuyahoga)
144	AKRON-CHURCH2	Holy Trinity Lutheran Church	50 North Prospect St	Akron, OH 44304 (Summit)
145	HILLSBORO-ADMIN	Hillsboro Administrative Office	119 Governor Foraker Place	Hillsboro, OH 45133 (Highland)
146	KNIGHTS-GARHTS	Knights of Columbus-Garfield Heights	10806 Granger Rd	Cleveland, OH 44125 (Cuyahoga)
147	ELIVER-LIB	Carnegie Public Library	219 East 4th Street	East Liverpool, OH 43920 (Columbiana)
148	LOVELAND-CHURCH	Epiphany United Methodist Church	6635 Loveland Miami Rd.	Loveland, OH 45140 (Clermont)
149	HILLIARD-CHURCH	Hilliard Presbyterian Church	3600 Leap Rd	Hilliard, OH 43026 (Franklin)
150	LORAIN-LIB	Lorain Branch Library	8216 Lorain Rd	Cleveland, OH 44102 (Cuyahoga)
151	WASH-YMCA	Washington Court House YMCA	100 Civic Dr	Washington Court House, OH 43160 (Fayette)
152	WAUSEON-LIB	Wauseon Public Library	117 East Elm Street	Wauseon, OH 43567 (Fulton)
153	ELYRIA-CHURCH2	Washington Avenue Christian Church	301 Washington Ave	Elyria, OH 44035 (Lorain)
154	CORNERSTONE-CHURCH	Cornerstone Baptist Church-Batavia	2249 Old State Route 32	Batavia, OH 45103 (Clermont)
155	ATHENS-CENTER	Athens Community Center	701 East State St	Athens, OH 45701 (Athens)
156	SPRINGFIELD-ARMORY	Springfield National Guard Armory	4440 Laybourne Rd	Springfield, OH 45505 (Clark)
157	SANDUSKY-LEGION	American Legion Post 83	3615 Hayes Ave	Sandusky, OH 44870 (Erie)
158	BRUNSWICK-LIB	Brunswick Community Library	3649 Center Road	Brunswick, OH 44212 (Medina)
159	BURTON-LIB	Burton Public Library	14588 W Park St	Burton, OH 44021 (Geauga)
160	COOLVILLE-LIB	Coolville Public Library	26401 Main St	Coolville, OH 45723 (Athens)
161	GOSHEN-CHURCH	Goshen United Methodist Church	6710 Goshen Rd	Goshen, OH 45122 (Clermont)
162	FINDLAY-CHURCH	Howard United Methodist Church-Findlay	220 Cherry St	Findlay, OH 45840 (Hancock)
163	LIMA-ARMORY	Lima National Guard Armory	855 S Collett St	Lima, OH 45804 (Allen)
164	LOVELAND-PRESCHURCH	Loveland Presbyterian Church	360 Robin Ave	Loveland, OH 45140 (Clermont)
165	MAPLEHEIGHTS-LIB	Maple Heights Branch Library	5225 Liberty Lane	Maple Heights, OH 44137 (Cuyahoga)
166	SHILOH-UMC	Shiloh United Methodist Church	580 Anderson Ferry Rd	Cincinnati, OH 45238 (Hamilton)
167	DAYTON-CHURCH	St. John's United Church of Christ	515 East Third St	Dayton, OH 45402 (Montgomery)
168	TOLEDO-ARMORY	Toledo ARNG Armory	925 Research Dr	Toledo, OH 43614 (Lucas)
169	HOWEY-ARMORY	Howey Rd. Armory	2170 Howey Rd	Columbus, OH 43211 (Franklin)
170	LAKEWOOD-LIB	Lakewood Public Library	15425 Detroit Avenue	Lakewood, OH 44107 (Cuyahoga)

ECOT Testing Facility Site List - ALL

TestSiteID	SiteCode	SiteName	Address	ddlPostalCode
171	CANTON-CHURCH	Zion Lutheran Church-Canton	702 Raff Rd SW	Canton, OH 44710 (Stark)
172	BETHEL-CHURCH	Bethel Community Christian Church	125 E. Plane St	Bethel, OH 45106 (Clermont)
173	GREENVILLE-LIB	Greenville Public Library	126 W. 4th St	Greenville, OH 45331 (Darke)
174	NEWLEBANON-LIB	New Lebanon Library	715 W. Main St	New Lebanon, OH 45345 (Montgomery)
175	WILLARD-LIBRARY	Willard Memorial Library	6 West Emerald St	Willard, OH 44890 (Huron)
176	MARIETTA-LEGION	American Legion Post 64	8th & Wooster St	Marietta, OH 45750 (Washington)
177	LOGAN-CHURCH	Logan Church of the Nazarene	650 Walhonding Ave	Logan, OH 43138 (Hocking)
178	BROOKLYN-BANQUET	Ridge Manor Banquet Center	4630 Ridge Rd.	Brooklyn, OH 44144 (Cuyahoga)
179	MINGOJUNCTION-CHURCH	First United Presbyterian Church	650 McLister Ave.	Mingo Junction, OH 43938 (Jefferson)
180	HUBERHTS-CHURCH	Grace Community Church-Huber Hts.	5001 Fishburg Rd	Huber Heights, OH 45424 (Montgomery)
181	MIDDLETOWN-ARMORY	Middletown Armory	2002 S. Main St.	Middletown, OH 45044 (Butler)
182	NORWOOD-CHURCH	Norwood Presbyterian Church	4400 Floral Avenue	Cincinnati, OH 45212 (Hamilton)
183	VFW-CLEVELAND	VFW Post 2850	3296 W. 61st St.	Cleveland, OH 44102 (Cuyahoga)
184	LORAIN-LEGION	American Legion Post 30	1112 West Erie Ave.	Lorain, OH 44052 (Lorain)
185	COLUMBIANA-LIB	Columbiana Public Library	332 N. Middle St.	Columbiana, OH 44408 (Columbiana)
186	PAINES-CHURCH	First Church of Christ-Painesville	422 Mentor Ave.	Painesville, OH 44077 (Lake)
187	WCH-ELKS	Elks Lodge	277 S. Main St.	Washington Court House, OH 43160 (Fayette)
189	ALT-ASSESSMENT	Alternative Assessment	c/o DEC Department	Columbus, OH 43207 (Franklin)
190	WESTCARROLL-YMCA	West Carrollton YMCA	900 S. Alex Road	West Carrollton, OH 45449 (Montgomery)
191	MTVERNON-LIB	Public Library of Mount Vernon	201 North Mulberry St	Mount Vernon, OH 43050 (Knox)
192	ELYRIA-CHURCH3	Church of Christ-Elyria	1101 Lake Ave	Elyria, OH 44035 (Lorain)
193	MAIZE-CHURCH	Maize Manor United Methodist Church	3901 Maize Rd	Columbus, OH 43224 (Franklin)
194	CLEVELAND-ZOO	Cleveland Metroparks Zoo-Auditorium	3900 Wildlife Way	Cleveland, OH 44109 (Cuyahoga)
195	WCH-CHURCH	Grace Community Church-WCH	525 Glenn Ave	Washington Court House, OH 43160 (Fayette)
196	WARREN-CHURCH	Grace Fellowship Church	2150 Niles Cortland Rd	Warren, OH 44484 (Trumbull)
197	HILLTOP-LIB	Hilltop Branch Library	511 S. Hague Ave	Columbus, OH 43204 (Franklin)
198	MANSFIELD-FAIR	Richland Co Fairgrounds	750 North Home Rd	Mansfield, OH 44906 (Richland)
199	SHAKERHTS-LIB	Shaker Heights Public Library	16500 Van Aken Blvd	Shaker Heights, OH 44120 (Cuyahoga)
200	CLEVE-CHURCH	St. Helena's Catholic Church	1367 W. 65th St.	Cleveland, OH 44102 (Cuyahoga)
201	SYLVANIA-CHURCH	St. Stephen Lutheran Church-Sylvania	7800 Erie St.	Sylvania, OH 43560 (Lucas)
202	CAMBRIDGE-CHURCH	Unity Presbyterian Church-Cambridge	130 N. 7th St	Cambridge, OH 43725 (Guernsey)
203	LANCASTER-LEGION	American Legion Post 11	279 Canal St.	Lancaster, OH 43130 (Fairfield)
204	CINCY-CHURCH	Christ Lutheran Church-Cincinnati	3301 Compton Rd.	Cincinnati, OH 45251 (Hamilton)
205	AKRON-CHURCH3	First United Methodist Church-Akron	263 E. Mill St.	Akron, OH 44308 (Summit)
206	NORTHLIGHTS-LIB	Northern Lights Library	4093 Cleveland Ave	Columbus, OH 43224 (Franklin)
207	UPPERSAN-CHURCH	John Stewart United Methodist Church	130 W. Johnson St.	Upper Sandusky, OH 43351 (Wyandot)
208	MARLBORO-CHURCH	Marlboro Christian Church	9383 Edison St NE	Alliance, OH 44601 (Stark)
209	MARIETTA-CHURCH	River of Life Church	200 Franklin St	Marietta, OH 45750 (Washington)
210	PLAINS-CHURCH	The Plains Church of the Nazarene	49 Connett Rd	The Plains, OH 45780 (Athens)
211	NEWLEX-CHURCH2	Community Holiness Church	Corner of Academy St and Thorn St.	New Lexington, OH 43764 (Perry)
212	COVENANT-WESTERVILLE	Faith Covenant Church-Westerville	3607 Dempsey Rd.	Westerville, OH 43081 (Franklin)
213	LIMA-CHURCH	St. Luke's Lutheran Church-Lima	209 W. North St.	Lima, OH 45801 (Allen)
214	FORESTHILL-CHURCH	Church of Christ at Forest Hill	3425 Mayfield Rd.	Cleveland, OH 44118 (Cuyahoga)
215	WESTCLEVE-CHURCH	Christ United Methodist Church-Cleve	3625 West 138th St.	Cleveland, OH 44111 (Cuyahoga)
216	DEFIANCE-CHURCH	St. Paul's United Methodist Church-Defiance	400 Wayne Ave	Defiance, OH 43512 (Defiance)
217	TOLEDO-CENTER	East Toledo Family Center	1020 Varland Ave	Toledo, OH 43605 (Lucas)
218	YOUNGS-PARK	Mill Creek MetroParks-Pioneer Pavilion	Old Furnace Rd.	Youngstown, OH 44511 (Mahoning)
219	TROTWOOD-CHURCH2	St. Margaret's Episcopal Church-Trotwood	5301 Free Pike	Dayton, OH 45426 (Montgomery)
220	EATON-CHURCH	Eaton First Church of God	601 E. Lexington Rd.	Eaton, OH 45320 (Preble)
221	FREMONT-CHURCH	Grace Lutheran Church-Fremont	705 W. State St.	Fremont, OH 43420 (Sandusky)
222	BLANCHESTER-CHURCH	Blanchester Church of the Nazarene	10451 State Route 28	Blanchester, OH 45107 (Clinton)
223	ASHLAND-CHURCH	Trinity Lutheran Church-Ashland	508 Center St.	Ashland, OH 44805 (Ashland)
224	AVONDALE-UMC	Avondale United Methodist Church	89 Avondale Ave.	Columbus, OH 43222 (Franklin)
225	ASHTABULA-COMMUNITY	Ashtabula Towne Square-Community Room	3315 N. Ridge Rd. East	Ashtabula, OH 44004 (Ashtabula)
226	CARROLLTON-LIB	Carroll County District Library	70 2nd St. NE	Carrollton, OH 44615 (Carroll)
227	COLUMBIANA-CHURCH	Columbiana First United Methodist Church	210 S. Main St.	Columbiana, OH 44408 (Columbiana)
228	GLADDEN-HOUSE	Gladden Community House	183 Hawkes Ave.	Columbus, OH 43223 (Franklin)
229	LOVELAND-HILL	Mosaic Cincinnati Church-Loveland	6541 Arborcrest Rd.	Loveland, OH 45140 (Clermont)
230	SALEM-CHURCH	New Salem Baptist Church	2956 Cleveland Ave.	Columbus, OH 43224 (Franklin)
231	PICKERINGTON-CHURCH	Pickerington Church of the Nazarene	11775 Pickerington Rd.	Pickerington, OH 43147 (Fairfield)
232	RAVENNA-FIRSTCHURCH	Ravenna First Church of God	237 New Milford Rd.	Ravenna, OH 44266 (Portage)
233	IRONTON-LIBRARY	The Briggs Lawrence County Public Library	321 South 4th St.	Ironton, OH 45638 (Lawrence)
234	KENTON-CHURCH	Trinity United Presbyterian Church-Kenton	301 W. Columbus St.	Kenton, OH 43326 (Hardin)
235	WESTGATE-LODGE	Westgate Lodge	2925 West Broad St.	Columbus, OH 43204 (Franklin)
236	XENIA-SCHOOL	Xenia Nazarene Christian School	1265 West 2nd St.	Xenia, OH 45385 (Greene)
237	NORWALK-CHURCH	St. Paul Episcopal Church-Norwalk	87 W. Main St.	Norwalk, OH 44857 (Huron)
238	FAMILIA-CHURCH	La Sagrada Familia Church	7719 Detroit Ave.	Cleveland, OH 44102 (Cuyahoga)
239	SHAKERHTS-CHURCH	St. Peters Lutheran Church-Shaker Heights	18000 Van Aken Blvd	Shaker Heights, OH 44122 (Cuyahoga)
240	UNION-YMCA	Union County Family YMCA	1150 Charles Lane	Marysville, OH 43040 (Union)
241	GALLIPOLIS-CHURCH	Grace United Methodist Church-Gallipolis	600 2nd Ave	Gallipolis, OH 45631 (Gallia)
242	TIFFIN-CHURCH	Trinity United Church of Christ-Tiffin	131 East Perry St.	Tiffin, OH 44883 (Seneca)
243	MARION-CHURCH	Marion First Church of the Nazarene	233 W Church St	Marion, OH 43302 (Marion)
244	MTCARMEL-CHURCH	Our Lady of Mount Carmel Church	343 Via Mt Carmel Ave.	Youngstown, OH 44505 (Mahoning)
245	SPRINGFIELD-INN	Springfield Quality Inn and Conference Center	383 East Leffel Lane	Springfield, OH 45505 (Clark)
246	IRONTON-CHURCH	Ironton First United Methodist Church	101 North 5th St	Ironton, OH 45638 (Lawrence)
247	INN-WARREN	Comfort Inn Warren	136 North Park Avenue	Warren, OH 44481 (Trumbull)
248	EUCLID-CENTRE	Shore Cultural Centre	291 E. 222nd St.	Euclid, OH 44123 (Cuyahoga)
249	MARIETTA-CENTER	Washington County Career Center	21740 St. Rt. 676	Marietta, OH 45750 (Washington)
250	WESTUNION-CHURCH	Bible Baptist Church-West Union	9840 State Route 41	West Union, OH 45693 (Adams)
251	WESTLAKE-CHURCH	Prince of Peace Lutheran Church-Westlake	28455 Center Ridge Rd	Westlake, OH 44145 (Cuyahoga)
252	CELINA-CHURCH	Celina First Church of God	850 Fairground Rd	Celina, OH 45822 (Mercer)
253	BROADST-CHURCH	Broad Street Presbyterian Church	760 East Broad St	Columbus, OH 43205 (Franklin)
254	CROSSPOINT-CHURCH	Cross Point Christian Church	10659 Johnstown Rd	New Albany, OH 43054 (Franklin)
255	FOSTORIA-CHURCH	High St United Methodist Church-Fostoria	243 W. High St	Fostoria, OH 44830 (Hancock)

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TestSiteID	SiteCode	SiteName	Address	ddlPostalCode
256	MARTINLUTHER-CHURCH	Martin Luther Lutheran Church-Toledo	601 Nevada Street	Toledo, OH 43605 (Lucas)
257	NEWCARLISLE-CHURCH	New Carlisle Church of the Brethren	219 North Main St	New Carlisle, OH 45344 (Clark)
258	NEWLIFE-CHURCH	New Life Church Gahanna	3690 North Stygler Rd	Gahanna, OH 43230 (Franklin)
259	OXFORD-LIB	Oxford Lane Library	15 S. College Ave.	Oxford, OH 45056 (Butler)
260	CHARDON-CHURCH	Pilgrim Christian Church-Chardon	202 South Hambden St.	Chardon, OH 44024 (Geauga)
261	STEBENVILLE-LIB	Schiappa Branch Library-Steubenville	4141 Mall Drive	Steubenville, OH 43952 (Jefferson)
262	SPRINGFIELD-CENTER	Springfield Champions Center	4122 Laybourne Rd	Springfield, OH 45505 (Clark)
263	CANALFULTON-CHURCH	St. John Lutheran Church-Canal Fulton	336 Market St., West	Canal Fulton, OH 44614 (Stark)
264	WCBUS-CHURCH	Trinity Assembly of God-Columbus	1112 Demorest Rd	Columbus, OH 43204 (Franklin)
265	TRINITY-YOUNGSCHURCH	Trinity United Methodist Church-Youngstown	30 West Front St.	Youngstown, OH 44503 (Mahoning)
266	BRYAN-CHURCH	Wesley United Methodist Church-Bryan	903 Center St	Bryan, OH 43506 (Williams)
267	FIREHOUSE-NEWARK	The Firehouse-Newark Church of the Nazarene	71 Maholm St	Newark, OH 43055 (Licking)
268	CHURCH-MADISON	Central Congregational Church of Madison	71 Park St.	Madison, OH 44057 (Lake)
269	PORTSMOUTH-CHURCH	Second Presbyterian Church-Portsmouth	801 Waller St	Portsmouth, OH 45662 (Scioto)
270	READING-CHURCH	St. John United Church of Christ-Reading	729 Jefferson Ave	Reading, OH 45215 (Hamilton)
271	WARREN-CHURCH2	Grace United Methodist Church-Warren	1725 Drexel Ave. NW	Warren, OH 44485 (Trumbull)
272	DAYTON-HALL	Columbian Hall	4704 Burkhardt Rd	Dayton, OH 45403 (Montgomery)
273	BELLEVUE-REC	Bellevue Community Center	110 Cherry Blvd.	Bellevue, OH 44811 (Sandusky)
274	ROCK-CHURCH	The Rock Community Church	9403 Garfield Blvd.	Garfield Heights, OH 44125 (Cuyahoga)
275	ERIE-BUILDING	Erie Co Building - Services Center	2900 Columbus Ave.	Sandusky, OH 44870 (Erie)
276	NILES-CHURCH	Trinity Lutheran Church-Niles	56 N. Chestnut Ave.	Niles, OH 44446 (Trumbull)
277	TRUENORTH-WAUSEON	True North Ministry Church-Wauseon	405 East Linfoot St.	Wauseon, OH 43567 (Fulton)
278	NEWCOMERSTOWN-LIB	Newcomerstown Public Library	123 East Main St	Newcomerstown, OH 43832 (Tuscarawas)
279	MARION-LIB	Marion Public Library	445 East Church St.	Marion, OH 43302 (Marion)
280	MTVERNON-CHURCH	First Church of the Nazarene-Mt. Vernon	807 Coshocton Ave	Mount Vernon, OH 43050 (Knox)
281	ASCENSION-CHURCH	Ascension Lutheran Church-Columbus	1479 Morse Rd.	Columbus, OH 43229 (Franklin)
282	BRUNSWICK-CHURCH	Brunswick United Methodist Church	1395 Pearl Rd.	Brunswick, OH 44212 (Medina)
283	DAYSRING-CHURCH	Dayspring Community Church-Canal Winchester	3919 Brice Rd.	Canal Winchester, OH 43110 (Franklin)
284	NORTHFIELD-CHURCH	Epiphany Lutheran Church-Northfield	10503 Valley View Rd.	Northfield, OH 44067 (Summit)
285	XENIA-CHURCH	First Church of Christ-Xenia	441 Ledbetter Rd	Xenia, OH 45385 (Greene)
286	LORAIN-CHURCH	First Congregational Church of Lorain	423 Washington Ave	Lorain, OH 44052 (Lorain)
287	COLLEGEHILL-CHURCH	Grace Episcopal Church-Cincinnati	5501 Hamilton Ave	Cincinnati, OH 45224 (Hamilton)
288	MIDDLEPORT-CHURCH	Heath United Methodist Church-Middleport	339 S. 3rd St	Middleport, OH 45760 (Meigs)
289	NEWLEXINGTON-CHURCH	New Lexington First United Methodist Church	126 South High St.	New Lexington, OH 43764 (Perry)
290	MAPLEHTS-CHURCH	The Lutheran Church of the Covenant-Maple Hts.	19000 Libby Rd.	Maple Heights, OH 44137 (Cuyahoga)
291	TRIEDSTONE-CHURCH	Triedstone Baptist Church-Columbus	858 East 3rd Ave	Columbus, OH 43201 (Franklin)
292	WESTCARROLL-CHURCH	West Carrollton Nazarene Church	550 S. Elm St	West Carrollton, OH 45449 (Montgomery)
293	WESTWOOD-CHURCH	Westwood First Presbyterian Church	3011 Harrison Ave	Cincinnati, OH 45211 (Hamilton)
294	LANCASTER-CHURCH	Emanuel Lutheran Church-Lancaster	231 E. Mulberry Street	Lancaster, OH 43130 (Fairfield)
295	MARION-ALLIANCE	Cornerstone Alliance Church-Marion	2010 Marion-Marysville Rd	Marion, OH 43302 (Marion)
296	VANWERT-CHURCH	Calvary Evangelical Church-Van Wert	10686 County Highway 434	Van Wert, OH 45891 (Van Wert)
297	WHITEHALL-CHURCH	Faith Lutheran Church-Whitehall	730 Collingwood Ave.	Whitehall, OH 43213 (Franklin)
298	GREENVILLE-CHURCH	First United Methodist Church-Greenville	202 W. 4th St.	Greenville, OH 45331 (Darke)
299	AMELIA-CHURCH	Friendship Lutheran Church-Amelia	1300 White Oak Rd.	Amelia, OH 45102 (Clermont)
300	GOSPELCHURCH-CBUS	Gospel Lighthouse Church-Columbus	600 Frebis Ave.	Columbus, OH 43206 (Franklin)
301	WADSWORTH-CHURCH	Grace Lutheran Church-Wadsworth	146 High St.	Wadsworth, OH 44281 (Medina)
302	GROVECIITY-CHURCH	Highland Baptist Church-Grove City	3460 Hoover Rd	Grove City, OH 43123 (Franklin)
303	MCCONNEL-CHURCH	First Presbyterian Church-McConnelsville	183 E. Liberty St.	Mc Connelsville, OH 43756 (Morgan)
304	KETTERING-CHURCH	Kettering Church	1450 E. Dorothy Ln	Kettering, OH 45429 (Montgomery)
305	TROY-YMCA	Miami County YMCA-Robinson Branch	3060 South County Road 25A	Troy, OH 45373 (Miami)
306	OTTAWA-CHURCH	New Creation Lutheran Church-Ottawa	8127 East Main St.	Ottawa, OH 45875 (Putnam)
307	GARFIELDHTS-CHURCH	St. John Evangelical Lutheran Church-Garfield Hts.	11333 Granger Rd	Garfield Heights, OH 44125 (Cuyahoga)
308	MALVERN-CHURCH	St. Martin Lutheran Church-Malvern	301 West Main St	Malvern, OH 44644 (Carroll)
309	DUBLIN-CONF	Conference Center at OCLC	6600 Kilgour Place	Dublin, OH 43017 (Franklin)
310	COSHOCOTON-CHURCH	Coshocton Presbyterian Church	142 N. 4th St	Coshocton, OH 43812 (Coshocton)
311	CRESTLINE-LIB	Crestline Public Library	324 N Thoman Street	Crestline, OH 44827 (Crawford)
312	NEWFALLS-CHURCH	First Christian Church-Newton Falls	17 N. Center St.	Newton Falls, OH 44444 (Trumbull)
313	BELLAIRE-CHURCH	First United Methodist Church-Bellaire	3402 Guernsey St.	Bellaire, OH 43906 (Belmont)
314	CANALWIN-CHURCH	Grace Bible Church-Canal Winchester	424 Gender Rd.	Canal Winchester, OH 43110 (Franklin)
315	CORTLAND-CHURCH	Prince of Peace Lutheran Church-Cortland	490 N. High St.	Cortland, OH 44410 (Trumbull)
316	PROCTORVILLE-CHURCH	Rome Church of Christ-Proctorville	86 Township Road 1056	Proctorville, OH 45669 (Lawrence)
317	ASHVILLE-CHURCH	Village Chapel United Methodist Church-Ashville	30 Circleville Avenue	Ashville, OH 43103 (Pickaway)
318	WESTPARK-SCHOOL	West Park Lutheran School	4260 Rocky River Dr.	Cleveland, OH 44135 (Cuyahoga)
319	WILMINGTON-CHURCH	Wilmington United Methodist Church	50 E. Locust St.	Wilmington, OH 45177 (Clinton)
320	NORTHBEND-CHURCH	North Bend United Methodist Church	123 Symmes Ave	North Bend, OH 45052 (Hamilton)
321	PILGRIM-TOLEDO	Pilgrim Church NACCC - Toledo	1375 W. Sylvania Ave.	Toledo, OH 43612 (Lucas)
322	LAKEWOOD-CHURCH	Lakewood United Methodist Church	15700 Detroit Ave	Lakewood, OH 44107 (Cuyahoga)
323	NELSONVILLE-LIB	Nelsonville Public Library	95 W. Washington St.	Nelsonville, OH 45764 (Athens)
324	BETHEL-DAYTON	Bethel Christian Assembly of God-Dayton	327 S. Smithville Rd	Dayton, OH 45403 (Montgomery)
325	EPIPHANY-TOLEDO	Epiphany Lutheran Church-Toledo	915 N. Reynolds Rd.	Toledo, OH 43615 (Lucas)
326	LONDON-CHURCH	Grace Brethren Church-London	715 SR 42 SW	London, OH 43140 (Madison)
327	OLMSTEDFALLS-CHURCH	St. Andrews Presbyterian Church-Olmsted Falls	23114 West Rd.,	Olmsted Falls, OH 44138 (Cuyahoga)
328	MEDINA-CHURCH	Medina United Church of Christ	217 E. Liberty St.	Medina, OH 44256 (Medina)
329	ASHTABULA-LIB	Ashtabula County District Library	335 West 44th St.	Ashtabula, OH 44004 (Ashtabula)
330	REFORMATION-TOL	Reformation Lutheran Church-Toledo	4543 Douglas Rd	Toledo, OH 43613 (Lucas)
331	CHESAPEAKE-LIB	Chesapeake Branch Library	11054-A County Road 1	Chesapeake, OH 45619 (Lawrence)
332	BYESVILLE-LIBRARY	Byesville Branch Library	100 Glass Ave.	Byesville, OH 43723 (Guernsey)

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333	FORTMCKINLEY-CHURCH	Fort McKinley United Methodist Church	3721 West Siebenthaler Ave.	Dayton, OH 45406 (Montgomery)
334	GREENFIELD-LIB	Greenfield Branch Library	1125 Jefferson St	Greenfield, OH 45123 (Highland)
335	MTSTERLING-CHURCH	Mount Sterling Church of the Nazarene	226 North Market St.	Mount Sterling, OH 43143 (Madison)
336	MTORAB-CHURCH	Mt. Orab United Methodist Church	212 Church St.	Mount Orab, OH 45154 (Brown)
337	WILMINGTON-LIB	Wilmington Public Library	268 N. South St.	Wilmington, OH 45177 (Clinton)
338	MAHONING-CHURCH	Mahoning United Methodist Church	2214 Mahoning Ave.	Youngstown, OH 44511 (Mahoning)
339	MASON-RESORT	King's Island Resort & Conference Center	5691 Kings Island Drive	Mason, OH 45040 (Warren)
340	URBANA-CHURCH	Crossway Vineyard Church-Urbana	129 Oakland St	Urbana, OH 43078 (Champaign)
341	PORTCLINTON-LIB	Ida Rupp Public Library	310 Madison St.	Port Clinton, OH 43452 (Ottawa)
342	PATASKALA-CHURCH	Pataskala United Methodist Church	458 South Main St.	Pataskala, OH 43062 (Licking)
343	MARENGO-CHURCH	Marengo United Methodist Church	8 North Main St.	Marengo, OH 43334 (Morrow)
344	PAULDING-CHURCH	St. Paul Lutheran Church-Paulding	601 Flat Rock Dr.	Paulding, OH 45879 (Paulding)
345	ANDERSONFERRY-CHURCH	Anderson Ferry Church of Christ-Cincy	380 Greenwell Ave.	Cincinnati, OH 45238 (Hamilton)
346	CLUB-ELYRIA	Boys & Girls Club-Elyria	1821 Middle Ave	Elyria, OH 44035 (Lorain)
347	CALDWELL-CHURCH	Caldwell Church of the Nazarene	6 Cumberland St.	Caldwell, OH 43724 (Noble)
348	DAYSPRING-CINCY	Dayspring Church of God-Cincy	1060 Smiley Ave.	Cincinnati, OH 45240 (Hamilton)
349	FAITHCOV-YOUNGS	Faith Community Covenant Church-Youngstown	1919 East Midlothian Blvd.	Youngstown, OH 44502 (Mahoning)
350	CLAYTON-CHURCH	Happy Corner Church-Clayton	7037 North Union Rd.	Clayton, OH 45315 (Montgomery)
351	CLUB-LORAIN	Lowell Community Center-Boys & Girls Club	3200 Clinton Ave.	Lorain, OH 44055 (Lorain)
352	PILGRIM-CLEVE	Pilgrim United Church of Christ-Cleve	2592 West 14th St.	Cleveland, OH 44113 (Cuyahoga)
353	ASCENSION-MIDDLETOWN	The Episcopal Church of the Ascension-Middletown	2709 McGee Ave.	Middletown, OH 45044 (Butler)
354	TRINITY-DEFIANCE	Trinity United Methodist Church-Defiance	413 East 2nd St.	Defiance, OH 43512 (Defiance)
355	STCLAIRSVILLE-LIB	St. Clairsville Public Library	108 West Main Street	Saint Clairsville, OH 43950 (Belmont)
356	REFUGEE-CHURCH	First Church of God-Columbus	3480 Refugee Rd.	Columbus, OH 43232 (Franklin)
357	NEUPHILLY-CHURCH	Broadway United Methodist Church-New Philadelphia	120 Church Ave. SE	New Philadelphia, OH 44663 (Tuscarawas)
358	CONNECTIONS-CINCY	Connections Christian Church-Cincy	7421 E. Galbraith Rd.	Cincinnati, OH 45243 (Hamilton)
359	BLACKICK-CHURCH	Eastpointe Christian Church-Blacklick	745 N. Waggoner Rd	Blacklick, OH 43004 (Franklin)
360	FAIRBORN-CHURCH	Maple Hts Baptist Church-Fairborn	144 W. Funderburg Rd.	Fairborn, OH 45324 (Greene)
361	FELLOWSHIP-CBUS	Fellowship Lutheran Church-Columbus	7530 Sawmill Rd.	Columbus, OH 43235 (Franklin)
362	MASSILLON-CHURCH	Faith Lutheran Church-Massillon	107 6th St. SW	Massillon, OH 44647 (Stark)
363	WELLINGTON-CHURCH	First Baptist Church-Wellington	125 Grand Ave.	Wellington, OH 44090 (Lorain)
364	CHESAPEAKE-CHURCH	First Baptist Church of Chesapeake	10322 County Rd. 1	Chesapeake, OH 45619 (Lawrence)
365	GLENVILLE-CLEVE	Glenville New Life Community Church-Cleve	711 E. 105th St.	Cleveland, OH 44108 (Cuyahoga)
366	BUCYRUS-CHURCH	Good Hope Lutheran Church-Bucyrus	129 W. Charles St.	Bucyrus, OH 44820 (Crawford)
367	THORNVILLE-CHURCH	Grace Lutheran Church-Thornville	65 E. Columbus St.	Thornville, OH 43076 (Perry)
368	MILLERSBURG-HOTEL	Hotel Millersburg	35 West Jackson St.	Millersburg, OH 44654 (Holmes)
369	LODI-CHURCH	Lodi United Methodist Church	320 Medina St.	Lodi, OH 44254 (Medina)
370	LOUDONVILLE-CHURCH	Loudonville United Methodist Church	124 N. Market St.	Loudonville, OH 44842 (Ashland)
371	CLEVES-CHURCH	Miamitown Church of Christ-Cleves	6670 Ohio 128	Cleves, OH 45002 (Hamilton)
372	CLEVEHTS-CENTER	Cleveland Hts. Civic Conference & Event Center	3130 Mayfield Rd.	Cleveland, OH 44118 (Cuyahoga)
373	SALEM-REALIFE	Salem Realife Church	12824 Salem Warren Rd.	Salem, OH 44460 (Columbiana)
374	BG-CHURCH	St. Mark's Lutheran Church-BG	315 S. College Dr.	Bowling Green, OH 43402 (Wood)
375	SUNBURY-CHURCH	Sunbury United Methodist Church	100 W. Cherry St.	Sunbury, OH 43074 (Delaware)
376	PERRYCOOK-LIB	Perry Cook Memorial Public Library	7406 County Road 242	Shauck, OH 43349 (Morrow)
377	CUYAHOGAFALLS-CHURCH	United Presbyterian Church-Cuyahoga Falls	2819 Hudson Dr.	Cuyahoga Falls, OH 44221 (Summit)
378	ROCKCREEK-LIB	Rock Creek Public Library	2988 High Street	Rock Creek, OH 44084 (Ashtabula)
379	OXFORD-CHURCH	Oxford United Methodist Church	14 N. Poplar St.	Oxford, OH 45056 (Butler)
380	AMELIA-NAZARENE	Amelia Church of the Nazarene	1295 W. Ohio Pike	Amelia, OH 45102 (Clermont)
381	NORWOOD-METHODIST	Grace United Methodist Church-Norwood	2221 Slane Ave	Norwood, OH 45212 (Hamilton)
382	MASON-CENTER	Mason Municipal Center	6000 Mason-Montgomery Road	Mason, OH 45040 (Warren)
383	BLESSTRINITY-CLEVE	Blessed Trinity Church-Cleveland	14040 Puritas Ave.	Cleveland, OH 44135 (Cuyahoga)
384	ASSEMBLY-ATHENS	New Life Assembly of God-Athens	10 S. Green Dr.	Athens, OH 45701 (Athens)
385	PIKETON-LIB	Piketon Branch Library	200 East 2nd St	Piketon, OH 45661 (Pike)
386	GREENFIELD-CHURCH	Greenfield Church of Christ	955 Jefferson St.	Greenfield, OH 45123 (Highland)
387	HARRISBURG-LIB	Harrisburg Library	1036 High St.	Harrisburg, OH 43126 (Franklin)
388	WILLOUGHBY-PRES	First Presbyterian Church-Willoughby	4785 Shankland Rd.	Willoughby, OH 44094 (Lake)
389	BELLEFONTAINE-CHURCH	Bellefontaine First Church of God	1000 E. Brown Ave.	Bellefontaine, OH 43311 (Logan)
390	PIQUA-PLAZA	Fort Piqua Plaza-Banquet Center	308 N. Main St.	Piqua, OH 45356 (Miami)
391	ASHTABULA-HEADSTART	Ashtabula County Head Start	4510 Main St.	Ashtabula, OH 44004 (Ashtabula)
392	MINGOPARK-REC	Mingo Park Recreation Center-Delaware	500 E. Lincoln Ave.	Delaware, OH 43015 (Delaware)
393	GOLFCLUB-DAYTON	Miami Valley Golf Club-Dayton	3311 Salem Ave.	Dayton, OH 45406 (Montgomery)
394	FAITH-WILMINGTON	Faith Lutheran Church-Wilmington	421 East Vine St.	Wilmington, OH 45177 (Clinton)
395	TROY-CHURCH	Troy Church of the Nazarene	1200 Barnhart Rd.	Troy, OH 45373 (Miami)
396	GREEKCENTER-AKRON	Greek Community Center-Akron	129 South Union St	Akron, OH 44304 (Summit)
397	NEUPHILLY-CHURCH2	Faith Christian Church-New Philadelphia	2012 Pleasant Valley Rd. NE	New Philadelphia, OH 44663 (Tuscarawas)
398	NCANTON-CHURCH	North Canton Grace United Methodist Church	1720 Schneider St NW	North Canton, OH 44720 (Stark)
399	WJEFFERSON-CHURCH	West Jefferson United Methodist Church	36 South Center St	West Jefferson, OH 43162 (Madison)
400	PILGRIM-GLENVILLE	Pilgrim Church of Christ-Cleve	616 E. 105th St.	Cleveland, OH 44108 (Cuyahoga)
401	ASHLAND-METHODIST	Ashland First United Methodist Church	220 Sandusky Street	Ashland, OH 44805 (Ashland)
402	BAKERCENTER-ATHENS	Baker University Center-Ohio University	1 Park Place	Athens, OH 45701 (Athens)
403	BRATENAHL-CENTER	Bratenahl Community Center	10300 Brighton Rd	Bratenahl, OH 44108 (Cuyahoga)
404	CENTERVILLE-LIB	Centerville Library	111 W. Spring Valley Rd	Centerville, OH 45458 (Montgomery)
405	ALLIANCE-METHODIST	Christ United Methodist Church-Alliance	470 East Broadway St.	Alliance, OH 44601 (Stark)
406	EUCLID-METHODIST	East Shore Methodist Church-Euclid	23002 Lake Shore Blvd.	Euclid, OH 44123 (Cuyahoga)
407	GALION-CHURCH	First Lutheran Church-Galion	127 S. Columbus St.	Galion, OH 44833 (Crawford)
408	JOHNSTOWN-CHURCH	Johnstown United Methodist Church	159 S. Main St.	Johnstown, OH 43031 (Licking)
409	KENMORE-CHURCH	Kenmore Community Church of the Nazarene	2025 12th St SW	Akron, OH 44314 (Summit)

ECOT Testing Facility Site List - ALL

TestSiteID	SiteCode	SiteName	Address	ddlPostalCode
410	LANCASTER-METHODIST	Maple St. United Methodist Church-Lancaster	438 E. Wheeling St.	Lancaster, OH 43130 (Fairfield)
411	SHELBY-LIB	Marvin Memorial Library-Shelby	29 W. Whitney Ave.	Shelby, OH 44875 (Richland)
412	NAPOLEON-CHURCH	Napoleon Christ United Methodist Church	1255 Glenwood Ave	Napoleon, OH 43545 (Henry)
413	STREETSBORO-CHURCH	Streetsboro Church of Christ	1386 Russell Dr.	Streetsboro, OH 44241 (Portage)
414	CBUS-ASSEMBLY	Zion Christian Assembly-Columbus	6930 Motts Place Rd.	Canal Winchester, OH 43110 (Franklin)
415	GALION-LIB	Galion Public Library	123 N. Market St.	Galion, OH 44833 (Crawford)
416	JEFFERSON-LIB	Henderson Memorial Public Library-Jefferson	54 E. Jefferson St.	Jefferson, OH 44047 (Ashtabula)
417	STMARYS-CHURCH	Wayne St United Methodist Church-St. Marys	130 North Wayne St	Saint Marys, OH 45885 (Auglaize)
418	URBANA-METHODIST	Urbana United Methodist Church	238 North Main St.	Urbana, OH 43078 (Champaign)
419	BROWNRD-CBUS	Brown Rd Community Church-Columbus	1553 Brown Rd.	Columbus, OH 43223 (Franklin)
420	FIRSTCHURCH-PAINES	First Church Congregational-Painesville	22 Liberty St	Painesville, OH 44077 (Lake)
421	HILLSBORO-METHODIST	Hillsboro First United Methodist Church	133 East Walnut St.	Hillsboro, OH 45133 (Highland)
422	NILES-METHODIST	Niles First United Methodist Church	608 North Crandon Ave	Niles, OH 44446 (Trumbull)
423	HAMILTON-CHURCH	Park Ave United Methodist Church-Hamilton	801 Park Ave.	Hamilton, OH 45013 (Butler)
424	WORTHINGTON-CHURCH	St. John A.M.E. Church-Worthington	7700 Crosswoods Dr	Columbus, OH 43235 (Franklin)
425	TRENTON-CHURCH	Trenton Gracepointe Church of the Nazarene	220 N. Miami St.	Trenton, OH 45067 (Butler)
426	PARMA-ELKS	Parma Elks Lodge	2250 Snow Rd.	Parma Heights, OH 44130 (Cuyahoga)
427	COLLEGIATE-DAYTON	Collegiate Hts Church of Christ-Dayton	4310 Germantown Pike	Dayton, OH 45417 (Montgomery)
428	FAIRFIELD-CHURCH	Tri County Assembly-Fairfield	7350 Dixie Hwy.	Fairfield, OH 45014 (Butler)
429	LEXINGTON-CHURCH	Grace Brethren Church of Lexington	215 W Main St	Lexington, OH 44904 (Richland)
430	MASON-CHURCH	Tylersville Rd Christian Church-Mason	6771 Tylersville Rd.	Mason, OH 45040 (Warren)
431	STCLAIRSVILLE-CHURCH	St. Clairsville Church of Christ	190 Woodrow Ave.	Saint Clairsville, OH 43950 (Belmont)
432	MTGILEAD-CHURCH	Trinity United Methodist Church-Mt. Gilead	75 East High St.	Mount Gilead, OH 43338 (Morrow)
433	ALBANY-LIB	Wells Public Library-Albany	5200 W. Washington Rd.	Albany, OH 45710 (Athens)
434	STPAUL-NEWARK	St. Paul's Evangelical Lutheran Church-Newark	67 N. Fifth St.	Newark, OH 43055 (Licking)
435	WEDGEWOOD-YOUNGS	Wedgewood Park Evangelical Congregational Church	1944 South Meridian Rd	Youngstown, OH 44511 (Mahoning)
436	SHAWNEEUMC-LIMA	Shawnee Community United Methodist Church	2600 Zurmehly Rd	Lima, OH 45806 (Allen)
437	BELLEFONTAINE-CENTER	Union Station of Logan Co-Community Center	613 Hamilton St.	Bellefontaine, OH 43311 (Logan)
438	ELYRIA-LCCC	Spitzer Conference Center - LCCC	1005 N. Abbe Rd.	Elyria, OH 44035 (Lorain)
439	CLEVELAND-REC	Cleveland REC	4243 Fulton Rd.	Cleveland, OH 44144 (Cuyahoga)
440	MTVERNON-METHODIST	Gay Street United Methodist Church-Mt Vernon	18 North Gay St.	Mount Vernon, OH 43050 (Knox)
441	ECOTOFFICE-NCBUS	North Columbus Test Site-WesBanco	2700 E. Dublin-Granville Rd.	Columbus, OH 43231 (Franklin)
442	SANDUSKY-CHURCH	Grace Episcopal Church-Sandusky	315 Wayne St.	Sandusky, OH 44870 (Erie)
443	URBANA-BAPTIST	First Baptist Church-Urbana	401 N. Main St.	Urbana, OH 43078 (Champaign)
444	BUCYRUS-PRES	First Presbyterian Church of Bucyrus	125 S. Poplar St.	Bucyrus, OH 44820 (Crawford)
445	BAYVILLAGE-LIB	Bay Village Library	502 Cahoon Rd.	Bay Village, OH 44140 (Cuyahoga)
446	Portsmouth-CentralChurch	Central Church of Christ - Portsmouth	1211 Grandview Ave	Portsmouth, OH 45662 (Scioto)
447	CLEVE-CENTER	Cleveland ECOT Testing Center	4243 Fulton Road	Cleveland, OH 44144 (Cuyahoga)
449	XENIA-FIRST_NAZARENE_CHURCH	First Church of the Nazarene Church-Xenia	1204 West 2nd St.	Xenia, OH 45385 (Greene)
454	LOVELAND-TEMPLOCATIONS	TBD - Loveland	115 W. Loveland Ave.	Loveland, OH 45140 (Clermont)
456	PIQUA-KNIGHTSOFTJOHN	Knights of St. John Hall - Piqua	110 S. Wayne St.	Piqua, OH 45356 (Miami)
457	WEST UNION-HOLYTRINITYCHURCH	Holy Trinity Parish Church - West Union	612 E. Mulberry St.	West Union, OH 45693 (Adams)
459	COLUMBUS-RHEMACHRISTIAN	Rhema Christian Center - Columbus	2100 Agler Rd.	Columbus, OH 43224 (Franklin)
460	WOOSTER-CENTCHRIST	Central Christian Church - Wooster	407 N. Market St.	Wooster, OH 44691 (Wayne)
461	MASON-HOPECHURCH	Hope Church - Mason	4934 Western Row Rd	Mason, OH 45040 (Warren)
462	POMEROY-FARMERSBANK	Farmers Bank - Pomeroy	640 E. Main St.	Pomeroy, OH 45769 (Meigs)
463	WASHINGTONCH-ROSEAVE	Rose Avenue Community Center - WCH	412 Rose Avenue	Washington Court House, OH 43160 (Fayette)
464	JEFFERSON-COMMUNITYCENTER	Jefferson Community Center	11 E Jefferson St	Jefferson, OH 44047 (Ashtabula)
465	OREGON-LIB	Oregon Branch Library	3340 Dustin Rd.	Oregon, OH 43616 (Lucas)
466	SPRINGFIELD-CLARKLIB	Clark County Public Library	201 S. Fountain Ave.	Springfield, OH 45506 (Clark)
467	CLEVELANDHEIGHTS-LIB	Cleveland Heights- University Heights Public Library	2345 Lee Road	Cleveland Heights, OH 44118 (Cuyahoga)
468	GREENWICH-LIB	Greenwich Public Library	4 New Street	Greenwich, OH 44837 (Huron)
470	CANTON-STARKLIB	Stark County District Library-Main Branch	715 Market Ave N	Canton, OH 44702 (Stark)
471	WARREN-TRUMBULL-LIB	Warren-Trumbull County Library	444 Mahoning Ave	Warren, OH 44483 (Trumbull)
472	SPRINGFIELD-COVENANT PRESBYTERIAN CHURCH	Covenant Presbyterian Church	201 N. Limestone St.	Springfield, OH 45503 (Clark)
473	EAST LIVERPOOL-LIBRARY	East Liverpool - Carnegie Public Library	219 E 4th St.	East Liverpool, OH 43920 (Columbiana)
474	LICKING-LICKING COUNTY LIBRARY	Licking County Library - Main Library	101 W. Main St.	Newark, OH 43055 (Licking)
475	MANSFIELD - KINGWOOD CENTER	Kingwood Center	900 Park Ave. W.	Mansfield, OH 44906 (Richland)
476	CUYAHOGA- CUYAHOGA FAITH CENTER	Cuyahoga Faith Center	3240 E 55th St.	Cleveland, OH 44127 (Cuyahoga)
477	ECOTOFFICE-NCBUS	North Columbus-West Banco	2700 E Dublin-Grandville RD	Columbus, OH 43231 (Franklin)
478	WEST UNION - COMMISSIONER'S OFFICE	Commissioner's Office - West Union	215 North Cross St. Suite 102	West Union, OH 45693 (Adams)
479	XENIA - GREENE COUNTY FAIRGROUNDS	Greene County Fairgrounds	120 Fairground Rd.	Xenia, OH 45385 (Greene)
481	SHAKER HEIGHTS - HEIGHTS CHRISTIAN CHURCH	Heights Christian Church - Shaker Heights	17300 Van Aken Blvd	Shaker Heights, OH 44120 (Cuyahoga)
483	TALLMADGE - LIONS CLUB	Tallmadge Lion Club	245 Northeast Avenue	Tallmadge, OH 44278 (Summit)
484	TALLMADGE - LIONS CLUB	Tallmadge Lions Club	245 Northeast Ave	Tallmadge, OH 44278 (Summit)

Exhibit F

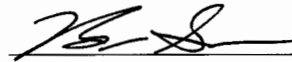
DECLARATION OF BRAD C. SCOTT

I, Brad Scott, declare the following:

1. I am the Director of IT for Electronic Classroom of Tomorrow ("ECOT").
2. ECOT utilizes over 480 temporary, pop-up testing facilities for student testing to fulfill the mandate under Ohio law requiring testing facilities to be made available to ECOT students that are located within 50 miles of the students' homes.
3. In a given year, ECOT typically utilizes around 180 of these temporary testing sites.
4. In some instances, the testing sites are utilized as few as three days. In other instances, the sites may be used for approximately seventy days a year, but not contiguously.
5. Prior to selecting a vendor for Internet access services to support our temporary testing sites, ECOT compared the cost of traditional, fixed Internet access for each of the sites to the cost of individual data plans for each site.
6. ECOT's analysis of the cost of Internet access for the 2015 Funding Year showed that a conservative estimate of costs for traditional wired Internet access would be \$600/month or \$7,200 per year/per temporary testing facility serviced.
7. When ECOT compared the cost of fixed broadband and the cost of individual data plans, ECOT determined that individual data plans would be the most cost-effective option.

To the best of my knowledge, I state under penalty of perjury that the letter and the foregoing are true and correct.

May 23, 2016



Brad C. Scott
Director of IT
Electronic Classroom of Tomorrow

Exhibit O

FY 2015 E-rate Application Information Request

8/20/2015

Contact Name: Greg Spencer

Applicant Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)

FCC Form 471 Application Number(s): 1009681

Response Due Date: 9/4/2015

Dear Applicant:

As we discussed in our conversation, we are in the process of reviewing your Funding Year 2015 FCC Form 471 Applications for E-rate discounts. To complete our review, we need additional information, which is listed below.

Cost Effectiveness of Wireless Data Plans

Individual wireless data plans, air cards and mobile hotspots for mobile devices are ineligible for E-rate support unless a school or library seeking support for these services demonstrates that individual data plans are the most cost effective option for providing internal broadband access at schools and libraries or that installing a wireless local area network was not physically possible due to geographical or other limitations. If applicants fail to demonstrate either of these conditions, the funding request amount associated with the ineligible items must be removed.

During the review of your Funding Year 2015 FCC Form 471 application 1009681, we have determined that FRN 2791199 is a request for Data plans for mobile devices which are generally considered ineligible services. Ineligible services cannot receive E-rate funding.

For additional information on product and services eligibility requirements, see: Before You Begin Eligibility –

<http://www.usac.org/sl/applicants/beforeyoubegin/default.aspx>.

Question

#	Questions	Your Response
1	Are recipients of service under this FRN bookmobiles or library kiosks?	____ Yes ____ No
2	If yes, please provide supporting documentation that all recipients of service on this FRN are bookmobiles or library kiosks. Questions below no longer apply.	
3	Otherwise, please confirm that you agree this FRN can not be funded.	____ Yes ____ No
4	If Yes, no additional information is required for this issue.	

5	If No, please provide the rationale of how Data plans for mobile devices are the most cost effective solution for your entity(ies) with supporting documentation.	Option 1: _____ Option 2: _____
a	<p>Option I: A wireless local area network is impractical to install.</p> <p>Please demonstrate that you sought quotes for a wireless local area network solution and provide the analysis, responses from vendors and other supporting documentation to demonstrate that the installation of a wireless local area network is not practical.</p>	
b	<p>Option II: Data plans or air cards for mobile devices are the most cost effective solution for the entity(ies).</p> <p>If you claim that individual wireless data plans or air cards are more cost-effective solutions than installing a wireless local area network, please submit the following documentation:</p> <ul style="list-style-type: none"> a. Please provide documentation to demonstrate that, during competitive bidding process for services requested in this FRN, you requested bids for both wireless local area networks as well as individual data plans connectivity solutions. b. Please provide competitive bidding documentation such as: <ul style="list-style-type: none"> i. Copies of bids and/or vendor quotes for individual wireless data plans and wireless local area network solutions. ii. If no bids were received, please provide a written confirmation of statements of no bids received for either solution. Additionally, please provide an explanation as to how your selection of the individual wireless data plan vendor was the most cost-effective solution. iii. Vendor selection matrix and other documentation demonstrating that you have conducted a cost comparison of both a wireless local area network solution and individual wireless data plans solutions to demonstrate that the data plan solution is more cost effective. Note that schools with existing fixed broadband connections should limit this comparison to the recurring cost of their current broadband connection plus the added cost of any upgrades to their broadband connections and any additional or updated internal connections needed to deploy a sufficiently robust WLAN. c. Please specify the number of students and patrons served by individual wireless data plans, air cards or mobile hotspots services requested in this FRN. 	

6	If you claim that services requested are eligible based on either Option #1 or Option #2, please answer the following question: Will E-rate service funded in this FRN be provided off campus?	_____ Yes _____ No
a	If Yes, please provide documentation identifying the charges associated with the ineligible use identified above. If the documentation does not specifically delineate the costs of the services, please provide information setting forth how the costs are allocated between eligible and ineligible use. Cost allocations must be based on tangible criteria and reach a realistic result.	<input type="checkbox"/> Enclosed
b	If No, no further information is needed.	

Please submit the necessary information within the 15 calendar day deadline of this request. Failure to respond may result in a reduction or denial of your funding request(s).

Response Reminders

Please email or fax the requested information to my attention. If you have any questions or you do not understand what we are requesting, please feel free to contact me.

It is important that we receive all of the information requested **within 15 calendar days** so we can complete our review of your application(s). **Failure to send all of the information requested may result in a reduction or denial of funding. If you need additional time to prepare your response, please let me know as soon as possible. If you are unable to provide the requested information because your school or library has closed for summer break, please indicate in writing the timeframe that you will be unavailable to respond.**

Additionally, please note that you are required to retain all documents related to the application for, receipt and delivery of supported services as well as any other documents that demonstrate compliance with the requirements of the program for at least 10 years after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request.

Thank you for your cooperation and continued support of the Universal Service Program.

Sincerely,

Nancy Rivera
Associate Manager, Cost Effectiveness Review
USAC, Schools and Libraries Division
Phone: 973-581-5055
Fax: 973-599-6520
E-mail: nancy.rivera@sl.universalservice.org

Exhibit P



Ms. Rivera,

ECOT is a non-traditional, virtual on-line school with 16,000-plus students. Classes are available anytime and anywhere to our students.

The response to your inquiry is at the end of each of the appropriate items and in blue type. Please do not hesitate to contact me with any issues or questions at 614.989.5399 or wgs003@gmail.com.

Included in our response is the following document:

Wireless Bid Analysis
ECOT Letter

Thank you for all your help,

Greg Spencer
614.989.5399
CRN 16062188

FY 2015 E-rate Application Information Request

8/20/2015

Contact Name: Greg Spencer
Applicant Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
FCC Form 471 Application Number(s): 1009681
Response Due Date: 9/4/2015

Dear Applicant:

As we discussed in our conversation, we are in the process of reviewing your Funding Year 2015 FCC Form 471 Applications for E-rate discounts. To complete our review, we need additional information, which is listed below.

Cost Effectiveness of Wireless Data Plans

Individual wireless data plans, air cards and mobile hotspots for mobile devices are ineligible for E-rate support unless a school or library seeking support for these services demonstrates that individual data plans are the most cost effective option for providing internal broadband access at schools and libraries or that installing a wireless local area network was not physically possible due to geographical or other limitations. If applicants fail to demonstrate either of these conditions, the funding request amount associated with the ineligible items must be removed.

During the review of your Funding Year 2015 FCC Form 471 application 1009681, we have determined that FRN 2791199 is a request for Data plans for mobile devices which are generally considered ineligible services. Ineligible services cannot receive E-rate funding.

For additional information on product and services eligibility requirements, see: Before You Begin Eligibility –
<http://www.usac.org/sl/applicants/beforeyoubegin/default.aspx>.

Question

#	Questions	Your Response
1	Are recipients of service under this FRN bookmobiles or library kiosks?	____ Yes <u>X</u> ____ No
2	If yes, please provide supporting documentation that all recipients of service on this FRN are bookmobiles or library kiosks. Questions below no longer apply.	
3	Otherwise, please confirm that you agree this FRN can not be funded.	____ Yes ____ No
4	If Yes, no additional information is required for this issue.	
5	If No, please provide the rationale of how Data plans for mobile devices are the most cost effective solution for your entity(ies) with supporting documentation.	Option 1: ____ Option 2: <u>X</u>
a	Option I: A wireless local area network is impractical to install. Please demonstrate that you sought quotes for a wireless local area network solution and provide the analysis, responses from vendors and other supporting documentation to demonstrate that the installation of a wireless local area network is not practical.	
b	Option II: Data plans or air cards for mobile devices are the most cost effective solution for the entity(ies). If you claim that individual wireless data plans or air cards are more cost-effective solutions than installing a wireless local area network, please submit the following documentation: a. Please provide documentation to demonstrate that, during competitive bidding process for services requested in this FRN, you requested bids for both wireless local area networks as well as individual data plans connectivity solutions. b. Please provide competitive bidding documentation such as: i. Copies of bids and/or vendor quotes for individual wireless data plans and wireless local area network solutions. ii. If no bids were received, please provide a written confirmation of statements of no bids received for either solution. Additionally, please provide an explanation as to how your selection of the individual wireless data plan vendor was the most cost-effective solution.	This wireless Internet Access is utilized by staff at multiple statewide public testing sites. Ohio law requires students to be in a location monitored by a licensed educator for state tests. Because ECOT's students are located across the entire state of Ohio, these sites are temporary locations. ECOT does not have the authority to install any type of Internet Access in these locations. Wireless Internet Access is the only solution

	<p>iii. Vendor selection matrix and other documentation demonstrating that you have conducted a cost comparison of both a wireless local area network solution and individual wireless data plans solutions to demonstrate that the data plan solution is more cost effective. Note that schools with existing fixed broadband connections should limit this comparison to the recurring cost of their current broadband connection plus the added cost of any upgrades to their broadband connections and any additional or updated internal connections needed to deploy a sufficiently robust WLAN.</p> <p>c. Please specify the number of students and patrons served by individual wireless data plans, air cards or mobile hotspots services requested in this FRN.</p>	<p>available to us and is the most cost effective method for our staff to monitor, communicate, and report during testing sessions and student visits. (Please attached ECOT letter)</p> <p>The vendor selection matrix is attached.</p> <p>The total number of students served by this service is 16,046.</p>
6	<p>If you claim that services requested are eligible based on either Option #1 or Option #2, please answer the following question:</p> <p>Will E-rate service funded in this FRN be provided off campus?</p>	<p>_____ Yes <u>X</u> No</p> <p>Again, since ECOT is a virtual school, all locations are considered on-campus.</p>
a	<p>If Yes, please provide documentation identifying the charges associated with the ineligible use identified above. If the documentation does not specifically delineate the costs of the services, please provide information setting forth how the costs are allocated between eligible and ineligible use. Cost allocations must be based on tangible criteria and reach a realistic result.</p>	<p><input type="checkbox"/> Enclosed</p>
b	<p>If No, no further information is needed.</p>	

Please submit the necessary information within the 15 calendar day deadline of this request. Failure to respond may result in a reduction or denial of your funding request(s).

Response Reminders

Please email or fax the requested information to my attention. If you have any questions or you do not understand what we are requesting, please feel free to contact me.

It is important that we receive all of the information requested **within 15 calendar days** so we can complete our review of your application(s). **Failure to send all of the information requested may result in a reduction or denial of funding. If you need additional time to prepare your response, please let me know as soon as possible. If you are unable to provide the requested information because your**

school or library has closed for summer break, please indicate in writing the timeframe that you will be unavailable to respond.

Additionally, please note that you are required to retain all documents related to the application for, receipt and delivery of supported services as well as any other documents that demonstrate compliance with the requirements of the program for at least 10 years after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request.

Thank you for your cooperation and continued support of the Universal Service Program.

Sincerely,

Nancy Rivera
Associate Manager, Cost Effectiveness Review
USAC, Schools and Libraries Division
Phone: 973-581-5055
Fax: 973-599-6520
E-mail: nancy.rivera@sl.universalservice.org

September 4, 2015

Ms. Nancy Rivera
Associate Manager, Cost Effectiveness Review
USAC, Schools and Libraries Division

Ms. Rivera,

The Electronic Classroom of Tomorrow is a virtual school with more than 16,000 students across the entire state of Ohio. Student learning takes place "anytime, anywhere". Because of our unique structure, we utilize many facilities across the state for testing and counseling services. These facilities may change at a moment's notice, due to site availability and student enrollment. The State of Ohio mandates that locations for required testing be no more than 30 miles from a student's home and have a licensed proctor physically present, so it is not feasible to utilize the student homes or existing equipment for testing. It is not possible or economical for our school to install permanent or even temporary Internet Access in these diverse locations. The most cost effective and operationally sound method of providing Internet Access to these locations is the wireless data plans for mobile devices. ECOT included this service on its Form 470 bid and selected Verizon Wireless as our vendor on the Form 471.

Please let me know if you have any additional questions.

Sincerely,



Brad C. Scott
Director of IT
Electronic Classroom of Tomorrow

3/10/2015

ECOT FY2015 Cell/Internet Devices Bid Analysis

Cellular Phones Verizon

Price	5	40%
Relationship	5	20%
Transition	5	20%
Term	5	20%
Total Score	5	

Internet Devices Verizon

Price	5	40%
Relationship	5	20%
Transition	5	20%
Term	5	20%
Total Score	5	

Exhibit Q

FY 2015 E-rate Application Information Request

1/8/2016

Contact Name: Greg Spencer

Applicant Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)

FCC Form 471 Application Number(s): 1009681

Response Due Date: 1/23/2016

Dear Applicant:

The Cost Effectiveness Review (CER) team is in the process of reviewing your Funding Year 2015 FCC Form 471 Applications for E-rate discounts. To complete our review, we need additional information, which is listed below.

I. Issue

We have completed our review of your Funding Year 2015 FCC Form 471 application 1009681 and have determined that FRN 2791199 includes ineligible items and therefore, will be denied.

Listed below are the ineligible items:

Ineligible Services
Off-premise usage.
Per the FCC Order 14-99, individual data plans and air cards are ineligible unless applicants can demonstrate either that installing a wireless local area network is not physically possible or that individual data plans are the most cost-effective option. You have not demonstrated that either of the two exceptions applies to services requested in this FRN.

If you do not agree with the review decision

If you disagree with our determination and you have alternative information, please provide third party documentation to support your position (e.g. vendor bill, contract, service agreement, etc.).

II. Issue

Based on the documentation that you have provided during the review of your Funding Year 2015 FCC Form 471 application #1009681, we noticed FRN 2840474 includes requests for off-premise services because the students utilizing the service can be located anywhere they have Internet Access. Services for a cyber-school entity are only eligible if students are located in eligible school sites while accessing the products and services.

Question

To assist us in the review of your application, we need the following information:

1. Please provide a cost allocation for the off-premise student usage. Any cost allocation provided for FRN 2840474 should include a reasonable explanation and supporting documentation explaining how you arrived at this cost allocation. If your supporting documentation does not specifically delineate between the costs of the eligible on campus usage and ineligible off campus usage, please provide information setting forth how these costs were allocated. Such a cost allocation must be based on tangible criteria and reach a realistic result.

Please submit the necessary information within the 15 calendar day deadline of this request. Failure to respond may result in a reduction or denial of your funding request(s).

It is important that we receive all of the information requested **within 15 calendar days** so we can complete our review of your application(s). **Failure to send all of the information requested may result in a reduction or denial of funding. If you need additional time to prepare your response, please let me know as soon as possible.**

Additionally, please note that you are required to retain all documents related to the application for, receipt and delivery of supported services as well as any other documents that demonstrate compliance with the requirements of the program for at least 10 years after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request.

Thank you for your cooperation and continued support of the Universal Service Program.

Sincerely,

Nancy Rivera
Associate Manager, Cost Effectiveness Review
USAC, Schools and Libraries Division
Phone: 973-581-5055
Fax: 973-599-6520
E-mail: nancy.rivera@sl.universalservice.org

Exhibit R

Ms. Rivera,

The response to your inquiry is at the end of each of the appropriate items and in bold, blue type. Please do not hesitate to contact me with any issues or questions at 614.989.5399 or wgs003@gmail.com.

Included in our response are the following documents:

BEN 221005 ELECTRONIC CLASSROOM OF TOMORROW (ECOT) - 1st CER Letter - 20150820 - ECOT Response
ECOT Enrolled Students 1-14-2016
Basic Network Diagram

Thank you for all your help,

Greg Spencer
614.989.5399
CRN 16062188

FY 2015 E-rate Application Information Request

1/8/2016

Contact Name: Greg Spencer
Applicant Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
FCC Form 471 Application Number(s): 1009681
Response Due Date: 1/23/2016

Dear Applicant:

The Cost Effectiveness Review (CER) team is in the process of reviewing your Funding Year 2015 FCC Form 471 Applications for E-rate discounts. To complete our review, we need additional information, which is listed below.

I. Issue

We have completed our review of your Funding Year 2015 FCC Form 471 application 1009681 and have determined that FRN 2791199 includes ineligible items and therefore, will be denied.

Listed below are the ineligible items:

Ineligible Services
Off-premise usage.
Per the FCC Order 14-99, individual data plans and air cards are ineligible unless applicants can demonstrate either that installing a wireless local area network is not physically possible or that individual data plans are the most cost-effective option. You have not demonstrated that either of the two

exceptions applies to services requested in this FRN.

If you do not agree with the review decision

If you disagree with our determination and you have alternative information, please provide third party documentation to support your position (e.g. vendor bill, contract, service agreement, etc.).

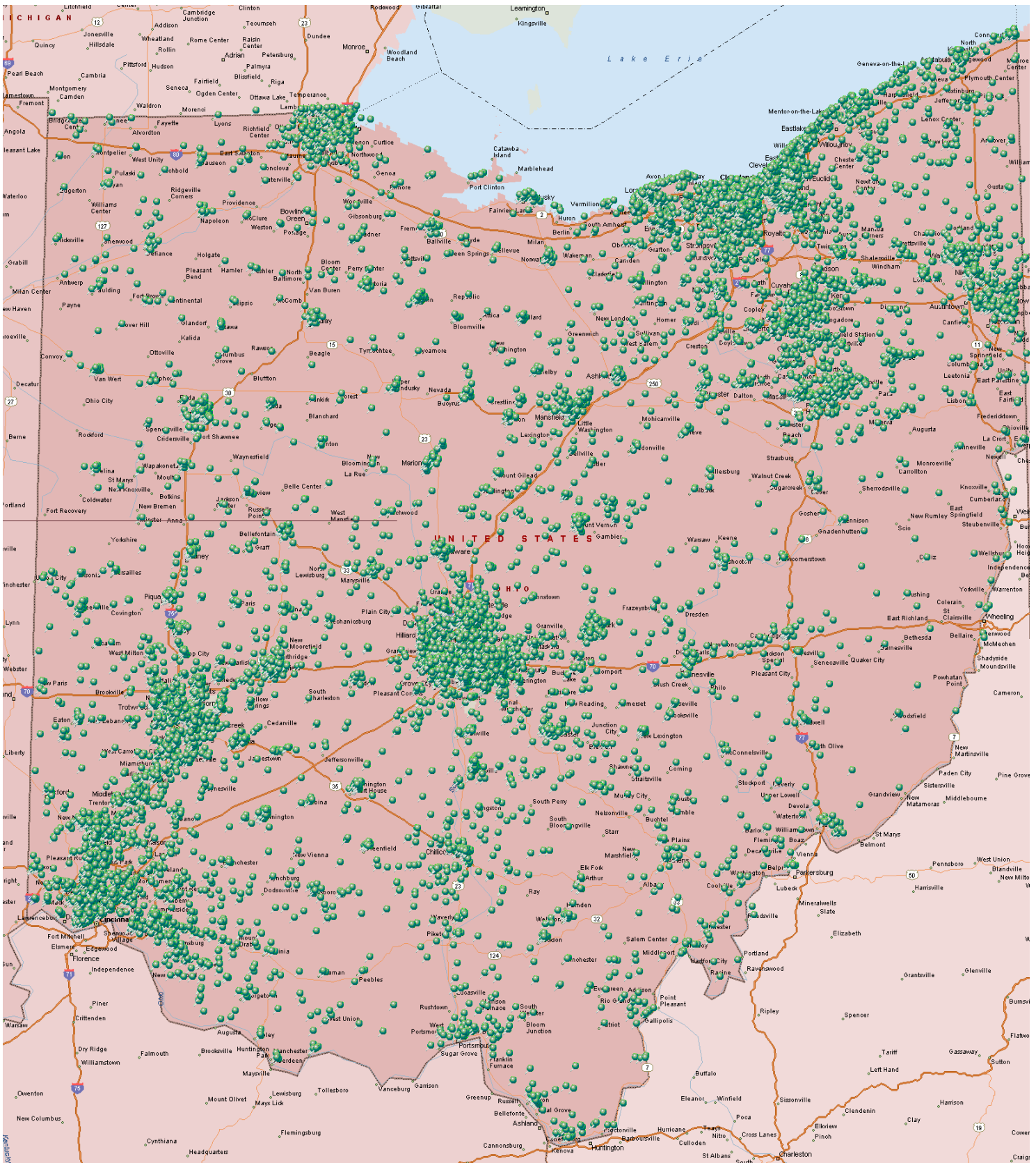
As stated in our response to the Cost Effectiveness Review dated 08/20/2015, these locations are temporary testing sites required by Ohio law. It is not cost effective to install hardwire Internet into these locations. Please see the attached document (BEN 221005 ELECTRONIC CLASSROOM OF TOMORROW (ECOT) - 1st CER Letter - 20150820 - ECOT Response).

According to the Ohio Revised Code, section 3314.25:

“Each internet- or computer-based community school shall provide its students a location within a fifty-mile radius of the student's residence at which to complete the statewide achievement and diagnostic assessments prescribed under sections 3301.079 , 3301.0710, and 3301.0712 of the Revised Code.”

This wireless Internet Access is utilized by staff at multiple statewide public testing sites. Ohio law requires students to be in a location monitored by a licensed educator for state tests. Because ECOT's students are located across the entire state of Ohio, these sites are temporary locations. ECOT does not have the authority to install any type of Internet Access in these locations. Wireless Internet Access is the only solution available to us and is the most cost effective method for our staff to monitor, communicate, and report during testing sessions and student visits.

Please refer to the image (ECOT Enrolled Students 1-14-2016) on the following page of ECOT's current enrollment. When establishing sites for adhering with the state's requirement to maintain sites within a 50 mile radius, on an ever shifting population of students as moves and new enrollments are accepted, it is neither feasible nor cost effective to maintain permanent sites with connectivity. Last year over 150 sites were required. Data cards that are activated for the duration of a testing window are the most cost effective method of providing Internet Access to proctoring staff in locations without existing connectivity.



II. Issue

Based on the documentation that you have provided during the review of your Funding Year 2015 FCC Form 471 application #1009681, we noticed FRN 2840474 includes requests for off-premise services because the students utilizing the service can be located anywhere they have Internet Access. Services for a cyber-school entity are only eligible if students are located in eligible school sites while accessing the products and services.

Question

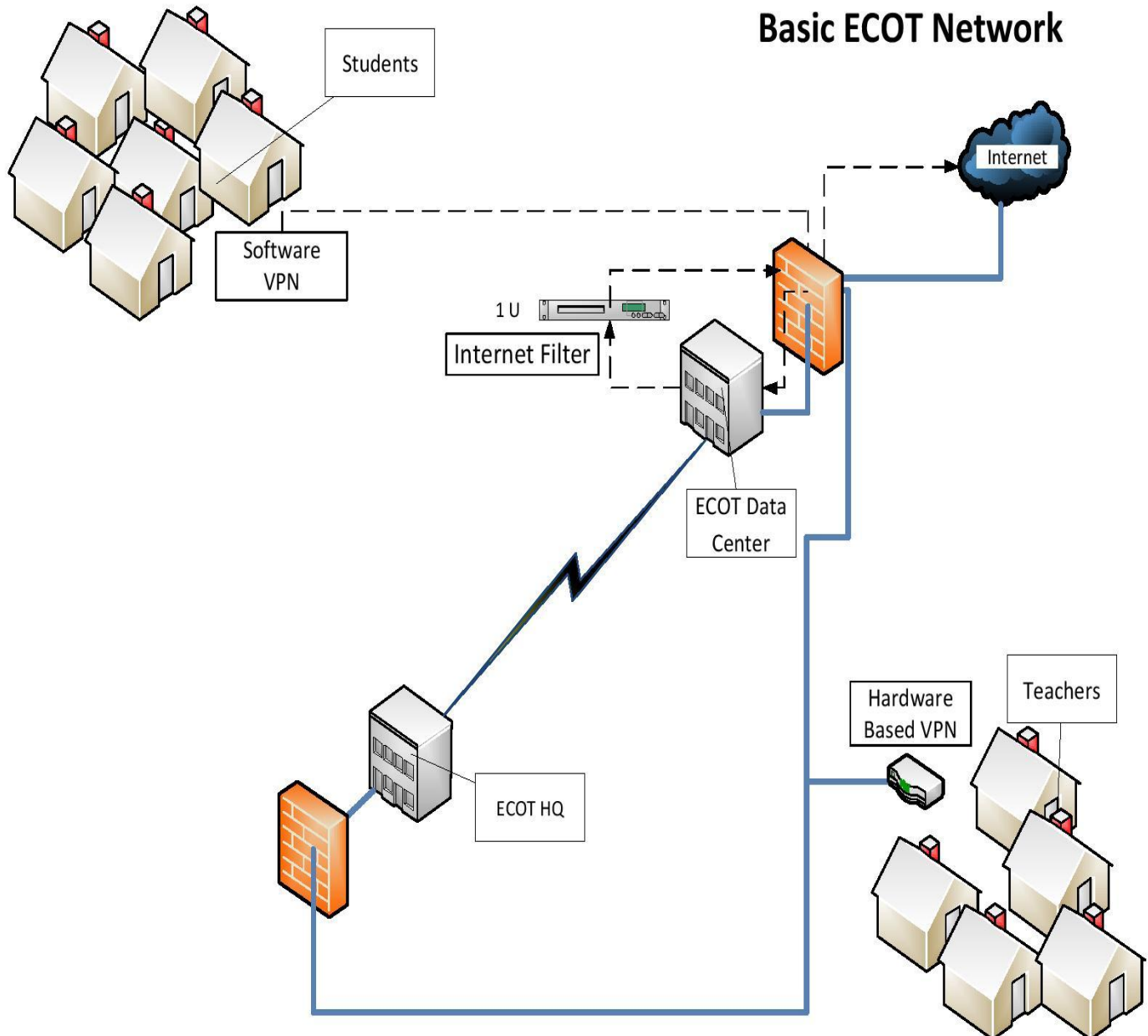
To assist us in the review of your application, we need the following information:

1. Please provide a cost allocation for the off-premise student usage. Any cost allocation provided for FRN 2840474 should include a reasonable explanation and supporting documentation explaining how you arrived at this cost allocation. If your supporting documentation does not specifically delineate between the costs of the eligible on campus usage and ineligible off campus usage, please provide information setting forth how these costs were allocated. Such a cost allocation must be based on tangible criteria and reach a realistic result.

There is no off-premise student usage to cost allocate from FRN 2840474. As stated in previous responses, the 3 Gb service is at our Scherers co-location. This service is the "front door" of our electronic school. Our entire educational curriculum is delivered to the students through our co-location facility. The students use their personal Internet connections to access our "front door" through the 3 Gb service in the co-location housing our data center. Please see the Network Diagram.

The charter from the state of Ohio under which ECOT must operate does not allow students to receive educational instruction from ECOT's facilities. As such, the state defines a student's school site as where they are accessing the school virtually, which in most situations is from their home. Please refer to the diagram (Basic Network Diagram) on the following page that illustrates how students and teachers access the school, and consider this information in the context of our student distribution across the state.

ECOT is not asking for funding of remote connectivity in households connecting them to the school. ECOT is requesting funding for the circuit ECOT utilizes for core communications.



Please submit the necessary information within the 15 calendar day deadline of this request. Failure to respond may result in a reduction or denial of your funding request(s).

It is important that we receive all of the information requested **within 15 calendar days** so we can complete our review of your application(s). **Failure to send all of the information requested may result in a reduction or denial of funding. If you need additional time to prepare your response, please let me know as soon as possible.**

Additionally, please note that you are required to retain all documents related to the application for, receipt and delivery of supported services as well as any other documents that demonstrate compliance with the requirements of the program for at least 10 years after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request.

Thank you for your cooperation and continued support of the Universal Service Program.

Sincerely,

Nancy Rivera
Associate Manager, Cost Effectiveness Review
USAC, Schools and Libraries Division
Phone: 973-581-5055
Fax: 973-599-6520
E-mail: nancy.rivera@sl.universalservice.org



Ms. Rivera,

ECOT is a non-traditional, virtual on-line school with 16,000-plus students. Classes are available anytime and anywhere to our students.

The response to your inquiry is at the end of each of the appropriate items and in blue type. Please do not hesitate to contact me with any issues or questions at 614.989.5399 or wgs003@gmail.com.

Included in our response is the following document:

Wireless Bid Analysis
ECOT Letter

Thank you for all your help,

Greg Spencer
614.989.5399
CRN 16062188

FY 2015 E-rate Application Information Request

8/20/2015

Contact Name: Greg Spencer
Applicant Name: ELECTRONIC CLASSROOM OF TOMORROW (ECOT)
FCC Form 471 Application Number(s): 1009681
Response Due Date: 9/4/2015

Dear Applicant:

As we discussed in our conversation, we are in the process of reviewing your Funding Year 2015 FCC Form 471 Applications for E-rate discounts. To complete our review, we need additional information, which is listed below.

Cost Effectiveness of Wireless Data Plans

Individual wireless data plans, air cards and mobile hotspots for mobile devices are ineligible for E-rate support unless a school or library seeking support for these services demonstrates that individual data plans are the most cost effective option for providing internal broadband access at schools and libraries or that installing a wireless local area network was not physically possible due to geographical or other limitations. If applicants fail to demonstrate either of these conditions, the funding request amount associated with the ineligible items must be removed.

During the review of your Funding Year 2015 FCC Form 471 application 1009681, we have determined that FRN 2791199 is a request for Data plans for mobile devices which are generally considered ineligible services. Ineligible services cannot receive E-rate funding.

For additional information on product and services eligibility requirements, see: Before You Begin Eligibility –
<http://www.usac.org/sl/applicants/beforeyoubegin/default.aspx>.

Question

#	Questions	Your Response
1	Are recipients of service under this FRN bookmobiles or library kiosks?	____ Yes <u>X</u> No
2	If yes, please provide supporting documentation that all recipients of service on this FRN are bookmobiles or library kiosks. Questions below no longer apply.	
3	Otherwise, please confirm that you agree this FRN can not be funded.	____ Yes ____ No
4	If Yes, no additional information is required for this issue.	
5	If No, please provide the rationale of how Data plans for mobile devices are the most cost effective solution for your entity(ies) with supporting documentation.	Option 1: ____ Option 2: <u>X</u>
a	Option I: A wireless local area network is impractical to install. Please demonstrate that you sought quotes for a wireless local area network solution and provide the analysis, responses from vendors and other supporting documentation to demonstrate that the installation of a wireless local area network is not practical.	
b	Option II: Data plans or air cards for mobile devices are the most cost effective solution for the entity(ies). If you claim that individual wireless data plans or air cards are more cost-effective solutions than installing a wireless local area network, please submit the following documentation: a. Please provide documentation to demonstrate that, during competitive bidding process for services requested in this FRN, you requested bids for both wireless local area networks as well as individual data plans connectivity solutions. b. Please provide competitive bidding documentation such as: i. Copies of bids and/or vendor quotes for individual wireless data plans and wireless local area network solutions. ii. If no bids were received, please provide a written confirmation of statements of no bids received for either solution. Additionally, please provide an explanation as to how your selection of the individual wireless data plan vendor was the most cost-effective solution.	This wireless Internet Access is utilized by staff at multiple statewide public testing sites. Ohio law requires students to be in a location monitored by a licensed educator for state tests. Because ECOT's students are located across the entire state of Ohio, these sites are temporary locations. ECOT does not have the authority to install any type of Internet Access in these locations. Wireless Internet Access is the only solution

	<p>iii. Vendor selection matrix and other documentation demonstrating that you have conducted a cost comparison of both a wireless local area network solution and individual wireless data plans solutions to demonstrate that the data plan solution is more cost effective. Note that schools with existing fixed broadband connections should limit this comparison to the recurring cost of their current broadband connection plus the added cost of any upgrades to their broadband connections and any additional or updated internal connections needed to deploy a sufficiently robust WLAN.</p> <p>c. Please specify the number of students and patrons served by individual wireless data plans, air cards or mobile hotspots services requested in this FRN.</p>	<p>available to us and is the most cost effective method for our staff to monitor, communicate, and report during testing sessions and student visits. (Please attached ECOT letter)</p> <p>The vendor selection matrix is attached.</p> <p>The total number of students served by this service is 16,046.</p>
6	<p>If you claim that services requested are eligible based on either Option #1 or Option #2, please answer the following question:</p> <p>Will E-rate service funded in this FRN be provided off campus?</p>	<p>_____ Yes <u> X </u> No</p> <p>Again, since ECOT is a virtual school, all locations are considered on-campus.</p>
a	<p>If Yes, please provide documentation identifying the charges associated with the ineligible use identified above. If the documentation does not specifically delineate the costs of the services, please provide information setting forth how the costs are allocated between eligible and ineligible use. Cost allocations must be based on tangible criteria and reach a realistic result.</p>	<p><input type="checkbox"/> Enclosed</p>
b	<p>If No, no further information is needed.</p>	

Please submit the necessary information within the 15 calendar day deadline of this request. Failure to respond may result in a reduction or denial of your funding request(s).

Response Reminders

Please email or fax the requested information to my attention. If you have any questions or you do not understand what we are requesting, please feel free to contact me.

It is important that we receive all of the information requested **within 15 calendar days** so we can complete our review of your application(s). **Failure to send all of the information requested may result in a reduction or denial of funding. If you need additional time to prepare your response, please let me know as soon as possible. If you are unable to provide the requested information because your**

school or library has closed for summer break, please indicate in writing the timeframe that you will be unavailable to respond.

Additionally, please note that you are required to retain all documents related to the application for, receipt and delivery of supported services as well as any other documents that demonstrate compliance with the requirements of the program for at least 10 years after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request.

Thank you for your cooperation and continued support of the Universal Service Program.

Sincerely,

Nancy Rivera
Associate Manager, Cost Effectiveness Review
USAC, Schools and Libraries Division
Phone: 973-581-5055
Fax: 973-599-6520
E-mail: nancy.rivera@sl.universalservice.org

September 4, 2015

Ms. Nancy Rivera
Associate Manager, Cost Effectiveness Review
USAC, Schools and Libraries Division

Ms. Rivera,

The Electronic Classroom of Tomorrow is a virtual school with more than 16,000 students across the entire state of Ohio. Student learning takes place "anytime, anywhere". Because of our unique structure, we utilize many facilities across the state for testing and counseling services. These facilities may change at a moment's notice, due to site availability and student enrollment. The State of Ohio mandates that locations for required testing be no more than 30 miles from a student's home and have a licensed proctor physically present, so it is not feasible to utilize the student homes or existing equipment for testing. It is not possible or economical for our school to install permanent or even temporary Internet Access in these diverse locations. The most cost effective and operationally sound method of providing Internet Access to these locations is the wireless data plans for mobile devices. ECOT included this service on its Form 470 bid and selected Verizon Wireless as our vendor on the Form 471.

Please let me know if you have any additional questions.

Sincerely,



Brad C. Scott
Director of IT
Electronic Classroom of Tomorrow

3/10/2015

ECOT FY2015 Cell/Internet Devices Bid Analysis

Cellular Phones Verizon

Price	5	40%
Relationship	5	20%
Transition	5	20%
Term	5	20%
Total Score	5	

Internet Devices Verizon

Price	5	40%
Relationship	5	20%
Transition	5	20%
Term	5	20%
Total Score	5	

CERTIFICATE OF SERVICE

I, Maureen Murphy, hereby declare that a copy of the foregoing request for review and waiver was sent via email, this day, September 26, 2016, to the following, as required by section 54.721(c) of the Commission's rules:

appeals@sl.universalservice.org


Maureen Murphy